

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA
UNITED STATES OF AMERICA :

vs

3:CR-17-324

FAIZAL BHIMANI & OM SRI
SAI, INC.

BEFORE: THE HONORABLE MALACHY E. MANNION

PLACE: COURTROOM NO. 4

PROCEEDINGS: JURY TRIAL

DATE: TUESDAY, OCTOBER 6, 2020

APPEARANCES:

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1 THE COURT: All right. Good morning. Welcome back.
2 Today we're going to begin the trial, so I'm going to begin
3 with in a moment having Barbe swear you in, and then I'm going
4 to give you some preliminary instructions on how the case will
5 proceed and some preliminary matters related to the law. At
6 the conclusion of the case, I will instruct you more fully on
7 that. So, Barbe, if you'd begin by swearing in the jurors.

8 (The jury was sworn at this time.)

9 THE COURT: Thank you all very much. Now, members of
10 the jury now you have been sworn, let me tell you a little
11 about your role as jurors in this case. Under our system of
12 justice, the role of the jury is to find the facts of the case
13 based on the evidence that is presented in the trial. You must
14 decide the facts only from the evidence presented to you here
15 in this courtroom during the trial.

16 From the evidence that you will hear and see in the
17 court, you will decide what the facts are and then apply those
18 facts to the law as I will give it to you in my final
19 instructions. That's how you will reach a verdict in the case.
20 Now, whatever your verdict, it will have to be unanimous. All
21 of you will have to agree on it, or there will be no verdict.
22 In the jury room when the case is complete, you will discuss
23 the case among yourselves, but ultimately each of you will have
24 to make up his or her own mind.

25 Therefore, each of you has a responsibility, which

1 you cannot avoid, and you should do your best throughout the
2 trial to fulfill this responsibility. Now, I play no part in
3 finding the facts. You should not take anything that I may say
4 or do during the trial as indicating what I think of the
5 evidence or what your verdict should be. My role is to make
6 whatever legal decisions have to be made during the course of
7 the trial and to explain to you the legal principles that must
8 guide your decisions at the conclusion of the case.

9 You must apply my instructions about the law. Each
10 of the instructions will be important. You must not substitute
11 your own notion or opinion of what the law is or ought to be.
12 You must follow the law as I give it to you, whether you agree
13 with it or not. Perform these duties fairly and impartially.
14 Do not let sympathy, prejudice, fear or public opinion
15 influence you in any way. You should not be influenced by a
16 person's race, color, religion, national ancestry or gender.

17 Now, here are some important rules for your conduct
18 as jurors during the course of the case. No. 1, keep an open
19 mind. Do not make up your mind about the verdict until you
20 have heard all of the evidence and I have given you the final
21 instructions on the law at the end of the trial, and at that
22 point that you will have discussed the case with your fellow
23 jurors during those final deliberations. In the meantime, do
24 not discuss the case among yourselves until the end of the
25 trial when you retire to the jury room to deliberate.

1 You need to allow each juror the opportunity to keep
2 an open mind throughout the entire trial. During trial you may
3 talk with your fellow jurors about anything else of a personal
4 nature or of common interest but nothing about the trial, the
5 witnesses or the evidence until the conclusion of the case when
6 you formally go back to deliberate.

7 Now, during the trial, you should not speak to any of
8 the parties, the lawyers or witnesses involved in the case, not
9 even to pass the time of day. So if you happen to pass one of
10 the lawyers in the elevator and they ignore you like you're not
11 there, they are not being rude. They're being ethical and
12 professional. And so you should know that in the beginning.
13 If any lawyer, party or witness does not speak to you when you
14 pass them in the hall, ride with them in the elevator or the
15 like, remember it's because they are supposed -- they're not
16 supposed to talk or visit with you either.

17 Do not talk with anyone else or listen to others talk
18 about this case until the trial has ended and you have been
19 discharged as jurors. It is important not only that you do
20 justice in this case but that you give the appearance of
21 justice. If anyone should try to talk to you about the case
22 during the trial, please report that to me immediately.

23 Do not discuss the case with anyone outside of the
24 courtroom or at home including your family and friends. This
25 is never an easy one because, as I said, during the course of

1 the trial, you will go home and whoever you happen to live
2 with, your best friend or significant other or mother, father,
3 brother, husband, wife, they'll all be saying, well, you can
4 tell me, I'm not going to tell anybody. The importance of this
5 is not necessarily telling them -- although that's what's not
6 allowed. The idea is not to have anyone else influence you by
7 their opinion of what they think of something when they have
8 not heard the evidence.

9 At the end of this trial, you will be the only 16
10 people that have heard everything that is presented in this
11 courtroom about the case, and that's the entire universe of
12 information that you can use to decide this case. No one else
13 is going to have that knowledge except you, and so their
14 opinion may be based on partial information or their surmise or
15 guess or wonder. That's not enough.

16 You may tell your family and friends that you've been
17 selected as a juror in a case, and you may tell them how long
18 the trial is expected to last. However, you should also tell
19 them that the judge has instructed you not to talk any more
20 about the case, and they should not talk to you about the case.
21 The reason, as I mentioned, is that sometimes someone else's
22 thoughts can influence you. Your thinking should be influenced
23 only by what you learn here in the courtroom. Now, until the
24 trial is over and your verdict is returned, do not watch or
25 listen to any television or radio news programs or reports

1 about this case or read any news or internet stories or
2 articles about this case or about anyone involved in this case.
3 Do not use a computer, cell phone or electronic device or tools
4 of technology while in the courtroom or at the end during your
5 deliberations. I will express that at the end. These devices
6 may be useful -- may be used during breaks or recesses for
7 personal use but may not be used to obtain or disclose
8 information about the case.

9 You may not communicate with anyone about the case on
10 your electronic device or media such as a phone, cell phone,
11 smart phone, internet service, text, instant messaging service,
12 chat room, blog, anything, Facebook, chat, Twitter, anything
13 that I haven't mentioned. You get the point. Any similar
14 technology is not to be used in any way related to this case.
15 Do not research or any make investigation on your own about any
16 matters related to the case or this type of case.

17 This means, for example, you must not visit the
18 scene, conduct experiments, conduct reference -- or consult
19 reference works or dictionaries or search the internet,
20 websites or blogs for additional information or to use your
21 computer or any electronic devices in any way to try to gain
22 additional information about this case, the type of case, the
23 parties in the case or anyone else who is involved in the case.

24 Please do not try to find out information from any
25 source outside of the confines of this courtroom. As I

1 mentioned, you must decide this case based only upon the
2 evidence in this courtroom and my instructions to you about the
3 law. It would be improper for you to try and supplement that
4 information on your own. Now, finally, you should not concern
5 yourself with or consider the possibility of punishment that
6 might be imposed if you returned a guilty verdict. That's my
7 obligation and my obligation alone. It has nothing to do with
8 the jury.

9 As you can see, the courtroom has been modified to
10 comply with the CDC safety protocols regarding COVID-19 for
11 your safety, the safety of the witnesses, the parties and the
12 attorneys. Now, during the trial it may be necessary for me to
13 talk with the lawyers outside of your hearing. You saw that
14 yesterday when we had jury selection. This is called a bench
15 or sidebar conference. If it happens, please be patient. We
16 also ask that you advise me through the courtroom deputy if
17 you're able to hear any of the bench or sidebar conferences
18 because the purpose is to hold these discussions outside of the
19 hearing of the jury for important reasons.

20 I know you may be curious about what it is we're
21 discussing. We're not trying to keep important information
22 from you. These conferences are necessary for me to discuss
23 with the lawyers objections to evidence and to be sure that the
24 evidence is presented to you correctly under the rules of
25 evidence. We will, of course, do what we can to keep the

1 number and length of these conferences to an absolute minimum.
2 If I think the conference will be long, I'll call a recess and
3 allow you to go out to stretch. I may not always grant a
4 lawyer's request for a conference. Do not consider my granting
5 or denying a request for a conference as any suggestion of my
6 opinion of the case or what your verdict should be. Now, at
7 the end of the trial, you must make your own decision based on
8 what you remember of the evidence. You will not have a written
9 transcript of the testimony to follow or review.

10 You must pay close attention to the testimony as it
11 is given. If you wish, you may take notes to help you remember
12 what a witness said. My courtroom deputy will arrange for
13 pens, pencils and paper. If you take notes, keep them to
14 yourself until the end of the trial when you and your fellow
15 jurors go to the jury room to decide the case. Here are some
16 more specific points concerning note taking if you decide to do
17 that. First and most importantly, you may take notes. It's
18 permitted. It is not required that you take notes.

19 How many notes you want to take, if any, is entirely
20 up to you. Be brief. Do not allow note taking to serve as a
21 distraction. Do not let your note taking distract you from
22 your task as jurors. You must listen to all of the testimony
23 of each witness. You also need to decide whether and how much
24 of each witness' testimony you believe. That will require you
25 to watch the appearance, behavior and manner of each witness

1 while he or she testifies. You cannot write down everything
2 that's said. There's always a fear that a juror will focus so
3 much on note taking that he or she will miss the opportunity to
4 make important observations. Now, your notes are memory aids.
5 They are not evidence. Notes are not a record or written
6 transcript of the trial. Whether or not you take notes, you
7 will need to rely on your own memory of what was said. Notes
8 are only to assist your memory. You should not be overly
9 influenced by notes.

10 In your deliberations, at the end of the case, do not
11 use your notes or any other jurors' notes as authority to
12 persuade fellow jurors, and do not give any more or less weight
13 to the views of a fellow juror just because the juror did or
14 did not take notes. Do not assume that just because someone
15 said something is in someone's notes that it necessarily took
16 place in court. It is just as easy to write down something
17 incorrectly as it is to hear or remember it incorrectly. Notes
18 are not entitled to any greater weight than each jurors'
19 independent memory of the evidence.

20 You should rely on your independent and collective
21 memories when you deliberate and reach your verdict. If you
22 take notes, do not take your notes away from the courthouse. I
23 repeat. At the end of each day, please place your notes in the
24 jury room. There will be an envelope. You can put your notes
25 in your envelope. Put your name on your envelope. No one will

1 look at your notes. The jury area will be closed to everyone
2 during the course of this trial and deliberations. Once the
3 case is over at the conclusion of the case when your
4 deliberations are done, we will collect all your notes. No one
5 will read those notes. They will be shredded. You must make
6 your decision in this case based only on the evidence you see
7 and hear in the courtroom. Do not let rumors, suspicion, or
8 anything else that you may see or hear outside of the Court
9 influence you in any way.

10 The evidence from which you are to find the facts
11 consists of the following: The testimony of witnesses,
12 documents or other things received as exhibits, any fact or
13 testimony that is stipulated to, that is, formally agreed to by
14 the parties. The following are not evidence, the statements
15 and the arguments of lawyers in the case, questions by lawyers
16 and questions that I might ask. You must not assume that a
17 fact is true just because one of the lawyers or I ask a
18 question about it. It is the witness' answers that are the
19 evidence. Of course, you may need to consider the question to
20 know what the witness means by his or her answer. For example,
21 if a witness answers yes to a question, you would have to
22 consider what the question was in order to understand what the
23 witness was saying.

24 Objections by lawyers including objections in which
25 they state facts are not evidence. Any testimony that I strike

1 or tell you to disregard is not evidence, anything you may see
2 or hear about this case outside of the courtroom. You should
3 use your common sense in weighing the evidence. Consider it in
4 a light of your everyday experience with people and events and
5 give it whatever weight you believe it deserves. If your
6 experience and common sense tell you that certain evidence
7 reasonably leads to a conclusion, you may reach that
8 conclusion. The rules of evidence control what can be received
9 into evidence.

10 When a lawyer asks a question or offers an exhibit
11 into evidence and a lawyer on the other side thinks it's not
12 permitted under the rules of evidence, that lawyer may object.
13 An objection simply means the lawyer is asking me to decide
14 whether the evidence should be allowed under the rules of
15 evidence. Lawyers have a responsibility to their client to
16 make objections when they think that the evidence being offered
17 is improper under the rules of evidence. You should not be
18 influenced by the fact that an objection is made. You should
19 not be influenced by my ruling on the objection to the
20 evidence.

21 If I overrule the objection, the question will be
22 answered or the exhibit will be received into evidence, and you
23 should treat that testimony or exhibit like any other. If I --
24 I may allow evidence only for a limited purpose. If I do that,
25 I will instruct you to consider the evidence only for that

1 limited purpose, and you must follow that instruction. If I
2 were to sustain an objection, the question will not be
3 answered, or the exhibit will not be received into evidence.
4 Whenever I sustain an objection, you must disregard the
5 question or the evidence entirely. Do not guess or think about
6 what the witness might have said in answer to the question.

7 Do not think about or guess what the exhibit might
8 have shown. Sometimes a witness may have already answered
9 before the lawyer objects or before I ruled on the objection.
10 If that happens and I sustained the objection, you should
11 disregard the answer that was given. Also I may order that
12 some testimony or other evidence be stricken or removed from
13 the record. If I do that, I will instruct you to disregard
14 that evidence.

15 That means when you are deciding the case you must
16 not consider or be influenced in any way by the testimony or
17 other evidence that I have told you to disregard. Now,
18 although the lawyers may call your attention to certain facts
19 or conclusions that they think are important, what the lawyers
20 say is not evidence and is not binding on you. It is your own
21 recollection and interpretation of the evidence that controls
22 your decision.

23 Also do not assume from anything that I do or say
24 during the trial that I have any opinion about what the
25 evidence -- I'm sorry -- any opinion about the evidence or

1 about any of the issues in the case or about what your verdict
2 should be. Generally there are two types of evidence that may
3 be used at trial, direct evidence and circumstantial evidence.
4 You may use both types of evidence in reaching your verdict.
5 Direct evidence is simply evidence which if believed directly
6 proves a fact.

7 An example of direct evidence occurs when a witness
8 testifies about something the witness knows from his or her or
9 her own senses, something the witness has seen, touched, heard
10 or smelled. Circumstantial evidence is evidence which if
11 believed indirectly proves a fact. It is evidence that proves
12 one or more facts from which you could find or infer the
13 existence of some other fact. An inference is simply a
14 deduction or conclusion that reason, experience and common
15 sense leads to you make from the evidence. An inference is not
16 a suspicion or a guess. It is a reasoned, logical decision to
17 find that a stipulated fact -- or a disputed fact exists on the
18 basis of another fact. The example I always use because we all
19 live in northeastern or north central Pennsylvania is if it was
20 January and before you went to bed, you looked outside and your
21 grass was all brown, no leaves on the trees, but it was a
22 bright and sunny day, and you woke up the next morning, opened
23 your curtain and there was an inch of snow out there, and yet
24 it was still bright and sunny in the morning. That would be
25 circumstantial evidence. You could reasonably conclude that it

1 snowed during the night. If you had gotten up in the middle of
2 night, and you opened your curtains and you saw white flakes
3 coming down from the sky, that would be direct evidence that it
4 had snowed during the night.

5 Now, sometimes different inferences may be drawn from
6 the same set of facts. The government may ask you to draw one
7 inference, and the defense may ask you to draw a different
8 inference. You and you alone must decide what inferences you
9 will draw based on all of the evidence in the case. You should
10 consider all of the evidence presented in this trial, direct
11 and circumstantial. The law makes no distinction between the
12 weight you should give to either direct or circumstantial
13 evidence. It is for you to decide how much weight to be given
14 to any evidence.

15 Now, in deciding what the facts are, you must decide
16 what testimony you believe and what testimony you do not
17 believe. You are the sole judges of the credibility of
18 witnesses. Now, credibility refers to whether a witness is
19 worthy of belief. Is the witness truthful? Is the witness'
20 testimony accurate? You may believe everything a witness says,
21 only a part of it or none of it. You may decide whether to
22 believe a witness based on his or her behavior and manner in
23 testifying, the explanation the witness gives, and all of the
24 other evidence in the case just as you would in any important
25 matter where you are trying to decide if a person is being

1 truthful, straightforward and accurate in his recollection or
2 her recollection in your own life.

3 In deciding the question of credibility, remember to
4 use your common sense, your good judgment and your worldly
5 experience. In deciding what to believe, you may consider a
6 number of factors. These include the opportunity and ability
7 of the witness to see or hear or know the things about which
8 the witness testifies, the quality of the witness' knowledge,
9 understanding and memory, the witness' appearance, behavior and
10 manner while testifying, whether the witness has an interest in
11 the outcome of the case or any motive, bias, or prejudice, any
12 relation the witness may have with a party in the case and any
13 effect that a verdict may have on the witness, whether the
14 witness said or wrote anything before trial that is different
15 from the witness' testimony in trial, whether the witness'
16 testimony is consistent or inconsistent with other evidence
17 that you believe and any other factor that bears on whether the
18 witness should be believed.

19 Now, inconsistencies or discrepancies in a witness'
20 testimony or between the testimony of different witnesses may
21 or may not cause you to disbelieve a witness' testimony. Two
22 or more persons witnessing an event may simply see or hear it
23 differently. Mistaken recollection like failure to recall is a
24 common human experience. In weighing the effect of an
25 inconsistency, you should consider whether it's about a matter

1 of importance or an insignificant detail. You should also
2 consider whether the inconsistency is innocent or intentional.
3 You're not required to accept the testimony even if the
4 witness' testimony is not contradicted and the witness is not
5 impeached. You may decide that the testimony is not worthy of
6 belief because of the witness' bearing or demeanor or because
7 of the inherent probability of the testimony or for any other
8 reason that is sufficient to you.

9 After you have made your own judgment about the
10 believability of a witness, you can then attach to that
11 witness' testimony the importance or the weight that you
12 believe it deserves. The weight of the evidence to prove a
13 fact does not necessarily depend on the number of witnesses who
14 testify. What is more important than numbers is how believable
15 the witnesses are and how much weight you think their testimony
16 deserves.

17 Now, the defendants Faizal Bhimani, Om Sri Sai, Inc.,
18 Nazim Hassam and the Pocono Plaza Inn, formerly known as the
19 Quality Inn, are charged with violating federal law.
20 Specifically, an indictment was filed against the defendants
21 Faizal Bhimani, Om Sri Sai, charging them with sex trafficking
22 by force and coercion and conspiracy to commit sex trafficking
23 by force and coercion. The indictment also charges that the
24 defendants Faizal Bhimani, Om Sri Sai, Inc. and Nazim Hassam
25 with conspiracy to distribute and possess with intent to

1 distribute controlled substances, namely, cocaine and cocaine
2 base, schedule two controlled substances, and heroin and
3 marijuana, schedule one controlled substances. Also all of the
4 defendants, namely, Faizal Bhimani, Om Sri Sai, Inc., Nazim
5 Hassam and the Pocono Plaza Inn, formerly known as the Quality
6 Inn, are charged with managing a drug premises.

7 The charges against defendants are contained in an
8 indictment. An indictment is just the formal way of specifying
9 each crime the defendant is accused of committing. An
10 indictment is simply a description of the charges against the
11 defendant. It is an accusation only. An indictment is not
12 evidence of anything, and you should not give any weight to the
13 fact that the defendants have been indicted in making your
14 decision in this case. It is merely the procedural method by
15 which we come into a trial.

16 Now, the defendants have pled not guilty to the
17 offenses charged. They are presumed to be innocent. They
18 start the trial with a clean slate with no evidence against
19 them. The presumption of innocence stays with the defendants
20 unless and until the government presents evidence that
21 overcomes that presumption by convincing you that the
22 defendants are guilty of the offenses charged beyond a
23 reasonable doubt.

24 The presumption of innocence requires that you find
25 the defendants not guilty unless you are satisfied that the

1 government has proved their guilt beyond a reasonable doubt.
2 The presumption of innocence means that the defendants have no
3 burden or obligation to present any evidence at all or to prove
4 that they are not guilty. The burden or obligation of proof is
5 on the government to prove that the defendants are guilty, and
6 this burden stays with the government throughout the trial.

7 In order for you to find the defendants guilty of the
8 offenses charged, the government must convince you that they
9 are guilty beyond a reasonable doubt. That means the
10 government must prove each and every element of the offense
11 charged beyond a reasonable doubt. The defendants may not be
12 convicted based on suspicion or conjecture but only on evidence
13 proving guilt beyond a reasonable doubt. Now, proof beyond a
14 reasonable doubt does not mean proof beyond all possible doubt
15 or to a mathematical certainty. Possible doubts or doubts
16 based on conjecture or speculation are not reasonable doubts.

17 A reasonable doubt is a fair doubt based on reason,
18 logic, common sense and experience. A reasonable doubt means a
19 doubt that would cause an ordinary reasonable person to
20 hesitate to act in matters of importance in his or her own
21 life. It may arise from the evidence or from the lack of
22 evidence or from the nature of the evidence. If after hearing
23 all the evidence you are convinced that the government has
24 proved the defendants guilty beyond a reasonable doubt, you
25 should return a verdict of guilty. However, if you have a

1 reasonable doubt as to any element of the offenses, then you
2 must return a verdict of not guilty. Now, as to the trial
3 proceedings themselves, in a moment we will begin with what are
4 called opening statements. Opening statements are where each
5 side has the opportunity if they choose to outline for you what
6 it is they expect the evidence will prove in the case. The
7 government has the burden of proof, and they go first.

8 After they've considered -- completed their opening
9 statement, then the defense has an opportunity if they wish to
10 do an opening statement as well. After the opening statements
11 are complete, we will begin the trial. The government, as I
12 mentioned, has the burden of proof. They will go first. They
13 will call witness to the stand to testify. When they call
14 those witnesses, the government counsel will ask those
15 witnesses questions. That's called direct examination. Once
16 the government has completed asking the questions they wish to
17 ask of a witness, the defense will have an opportunity to
18 question the witness.

19 That's called cross examination. This process will
20 continue -- let me stop for a second -- after the defense has
21 finished their cross examination, the government will have an
22 opportunity to do a redirect examination if necessary. That
23 process will continue as the government presents all of the
24 witnesses it wishes to present in the case. Once they have
25 presented all of the witnesses they wish to present, they will

1 rest. After they rest, the defense will have the opportunity
2 if they choose to call witnesses. It will be the same process.
3 The defense will call a witness to the stand if they choose to
4 the stand. Defense would question that witness. That would be
5 direct examination. When they're done, the government would
6 have the opportunity to cross-examine that witness. And when
7 that's done, the defense under certain circumstances would have
8 the opportunity to redirect that witness.

9 That process would continue until the defense has
10 called all of the witnesses that it wished to call in the case.
11 After everyone has rested and called all of the witnesses in
12 the case, then I will charge you on the law. I will tell you
13 what the law is for your deliberations. After I've done that,
14 I will allow counsel to do their closing arguments in the case
15 where they will argue to you why they believe you should agree
16 with their position in the case. The once that is completed, I
17 will give you some housekeeping instructions on how you will
18 perform your deliberations.

19 I will also give you a copy of the charge that is the
20 law that I will have already read you at that point in time. I
21 will give you a copy of that to take back with you during your
22 deliberations in case you wish to refer to that. Once you
23 begin your deliberations, you will continue those until you
24 have reached a verdict in the case. So that's the process that
25 I expect will take place as we go through the trial here today.

1 Finally, you must keep your minds open during the trial. Do
2 not make up your minds about any of the questions in the case
3 until you have heard each piece of evidence and all of the law
4 which you must apply to that evidence. In other words, until
5 you begin your deliberations at the conclusion of the case you
6 are to keep an open mind and listen to all of the evidence in
7 the case. All right. Government counsel ready to open?

8 MR. CAMONI: Yes, Your Honor.

9 THE COURT: You may remove your mask while you're at
10 the podium since you will be clearly socially distanced from
11 anybody for purposes of speaking.

12 MR. CAMONI: Thank you, Your Honor. Good morning.
13 Greed at its heart -- this case is about greed. Faizal Bhimani
14 was not a kingpin or a mafia don or some kind of criminal
15 mastermind. He was the general manager of a hotel in the
16 Poconos, a Howard Johnson in Bartonsville, Pennsylvania, owned
17 by his relative, Nazim Hassam. Somewhere along the line Faizal
18 Bhimani got greedy. Starting in 2011 drug dealers and sex
19 traffickers began to set up shop in Monroe County. Violent
20 gangs became more and more active, and Bhimani saw an
21 opportunity for himself and for the family business.

22 For years Bhimani provided a safe place for criminals
23 to sell drugs and sex at the Howard Johnson that he managed.
24 Women who were brutalized and kept strung out on drugs were
25 forced and coerced to sell their bodies by traffickers whom

1 Faizal Bhimani protected. Drug dealers met with customer after
2 customer in their rooms or out in the open in the parking lot
3 knowing that if police came near, Faizal would warn them, and
4 warn them he did. Why? Greed. Faizal Bhimani wanted money
5 for himself and for his family's business, and he wanted sex.
6 You will hear in Faizal Bhimani's own words that he knew
7 exactly who was staying in the hotel that he managed and that
8 he told those sex traffickers and drug dealers when there were
9 police on site because Faizal Bhimani was interviewed by
10 officers after his arrest.

11 You will see messages between Bhimani and sex
12 traffickers that revealed that he knew exactly what was going
13 on in the hotel that he managed and he was happy to rent them
14 rooms. The hotel owner, Nazim Hassam, Bhimani's uncle and
15 direct supervisor, lived at the hotel just like Bhimani, and
16 Hassam chose to allow all of this. He told his employees not
17 to call police because it was bad for business. He led by
18 example at the Howard Johnson and at his other hotel in
19 Stroudsburg turning his head and pretending not to see what was
20 right under his nose for years.

21 Even some of his employees sold and used drugs while
22 on the job. Both hotels became notorious with local law
23 enforcement. Why? Greed. Nazim Hassam wanted to fill those
24 rooms -- as many rooms as he could -- and he didn't care how.
25 These defendants Faizal Bhimani, Nazim Hassam, the company that

1 owns the Howard Johnson in Bartonsville called Om Sri Sai,
2 Incorporated, and the Pocono Plaza Inn, formerly known as the
3 Quality Inn in Stroudsburg, profited from the suffering and
4 misery of victims and drug addicts for years. This case is
5 about holding these defendants responsible not for crimes
6 committed by other people but for the crimes they committed by
7 helping criminals to succeed by facilitating and protecting
8 criminals and by profiting from and even by directly
9 participating in criminal activities.

10 This case began with an investigation into a violent
11 street gang in the Stroudsburg area that called themselves the
12 Black P. Stones. In 2014 the F.B.I. teamed up with local and
13 state police in an effort to stem the tide of drugs and
14 violence by dismantling the P. Stone gang, a local set or
15 subgroup of the notorious national gang the Bloods.
16 Investigators learned that the gang members made money through
17 means typical to street gangs, drug dealing, but also through
18 an even darker line of criminal activity, sex trafficking.

19 As the investigation continued and expanded to
20 identify drug dealers and sex traffickers beyond the P. Stone
21 members, a common theme became clear. As investigators
22 followed the mounting evidence, a pattern emerged. Many of the
23 sex traffickers and drug dealers arrested described a common
24 ally in their criminal endeavors and a safe place where they
25 were free to do whatever they liked. They described a person

1 who knew what they were up to and who would warn them when
2 police were near, a man who ran a hotel where a pimp or a drug
3 dealer could always get a room out of the way with easy access
4 to a secluded rear parking area away from the highway, a man
5 who'd let them pay cash without a deposit and allow them to
6 have a room without payment upfront knowing that they would be
7 working through the night and would pay after they earned
8 enough, a man who was willing to trade sex for discounted or
9 free rooms.

10 Throughout Monroe County, criminals knew that they
11 could count on Faizal Bhimani and that they had a safe place to
12 do business at the Howard Johnson hotel in Bartonsville. That
13 hotel was a hot bed of drug trafficking and sex trafficking for
14 years between 2011 and 2017. The evidence that the government
15 will present during the course of this trial will show that
16 Faizal Bhimani was the general manager at the Howard Johnson
17 hotel on Route 611 in Bartonsville.

18 Bhimani lived at the hotel and worked there full-time
19 directing the day-to-day operations of the business. That
20 hotel is owned by a company called Om Sri Sai, Incorporated. A
21 man Bhimani refers to as his uncle, Nazim Hassam, is the
22 managing shareholder of Om Sri Sai, and he and his wife also
23 live at the hotel. Hassam listed as an officer of Om Sri Sai
24 was Bhimani's supervisor and oversaw the finances of the hotel.

25 After Bhimani was arrested in 2017 as a result of

1 this investigation, Hassam took over Bhimani's day-to-day
2 management duties at the Howard Johnson as well.

3 Hassam is also part owner and managing shareholder in
4 a second hotel in Stroudsburg, formerly known as the Quality
5 Inn, but now called the Pocono Plaza Inn. The indictment in
6 this case charges Faizal Bhimani and Om Sri Sai, Incorporated,
7 with participating in and aiding and abetting sex trafficking.
8 It charges them with sex trafficking conspiracy as well.

9 It charges Bhimani, Om Sri Sai and Nazim Hassam with
10 drug trafficking conspiracy and charges all four defendants,
11 including the Pocono Plaza Inn, with managing the two hotels as
12 drug related premises. Now, I want to be clear about something
13 from the outset. Sex trafficking as it is charged in this case
14 is not just prostitution. It is not a person charging money
15 for sex of their own free will. This case is also not about
16 women chained in a basement or smuggled into a foreign country
17 as you may see in the movies. Under federal law if a victim
18 engages in commercial sex, that's sex for money or in trade for
19 anything of value and they do it because they were compelled to
20 do it by force, threats, coercion or fraud, that's sex
21 trafficking.

22 That means that the person who forced them or
23 threatened them or coerced them or defrauded them is guilty of
24 sex trafficking. But the law also makes it a crime if someone
25 knows that the victim is being trafficked or they recklessly

1 disregard that fact and they help to make it happen or benefit
2 financially from it. Now, Judge Mannion will instruct you on
3 the law. And you need to follow his instructions, and it is
4 important to understand as you take in all of the evidence you
5 will hear and see during into trial that while there is no
6 doubt that voluntary prostitution took place in this hotel,
7 too, that is not what is charged in this case.

8 Instead, the evidence in this case will show that
9 women were assaulted, manipulated, threatened, lied to and kept
10 high and addicted to drugs all to keep them working selling sex
11 for the profits of other people. Likewise, the government is
12 not claiming that Faizal Bhimani or Nazim Hassam or any other
13 employee of the hotels directly forced any victim to have sex
14 for money. Rather, the evidence will show that Bhimani and Om
15 Sri Sai, the Howard Johnson hotel, participated in sex
16 trafficking in other ways, aided and abetted sex trafficking
17 and conspired with or made criminal agreements with sex
18 traffickers.

19 Faizal Bhimani and the hotel provided rooms for sex
20 traffickers for their victims, agreed to let traffickers earn
21 money before paying for rooms and shielded traffickers from
22 police, and Bhimani and the hotel benefitted financially
23 knowing that money was the proceeds of sex trafficking. As you
24 will hear from the people who have lived it, sex trafficking
25 and drug trafficking are crimes driven by greed. Sex

1 traffickers -- sometimes also referred to as pimps -- control
2 women and exploit their vulnerabilities for one reason, to make
3 money. Drug dealers peddle poison and exploit the addictions
4 of their customers for one reason, to make money. In both,
5 those who suffered, generate profits for those who run the
6 business. And as you will hear during this trial, the Howard
7 Johnson hotel, Om Sri Sai, Incorporated, had no problem
8 profiting from that suffering, too. Sex traffickers sell sex
9 to their customers or their johns.

10 They sell the illusion that a young woman desires
11 them, and these johns pay for pleasure. For the woman when she
12 is selling her body not because she wants to but because that
13 pimp has forced her or coerced her or induced her under
14 fraudulent pretenses to do it, there's no pleasure in the act.
15 There's no pleasure in having sex with strangers a dozen times
16 a day only for the pimp to take all of the money. You will
17 hear that a trafficker uses whatever leverage he can to control
18 a victim. Hunger, the victim can't eat unless the pimp
19 provides food. Addiction, the pimp keeps a victim who is
20 addicted to heroin or meth or crack in line by providing just
21 enough drugs to keep her working, to keep her from getting dope
22 sick through withdrawal and to keep her under control. Fear, a
23 pimp will threaten force, will threaten retribution against the
24 victim or her family if a victim escapes or hides money or
25 disobeys the rules in the slightest. Pain, a trafficker will

1 strike or choke or rape a victim to maintain control. A sex
2 trafficking victim can't even buy tampons unless the pimp
3 allows it. The trafficker sets the rules, sets the prices and
4 decides when and where the victim works. This is not a case
5 about voluntary prostitution. You will also hear directly from
6 sex traffickers, pimps, who will tell you how they conducted
7 their business.

8 You will hear firsthand accounts from people who have
9 already pleaded guilty to their crimes about what they did at
10 those hotels and agreements and dealings they had with this man
11 Faizal Bhimani. You will hear how much easier these defendants
12 made it for these criminals to succeed and evade detection for
13 so long. And you will hear how these pimps plied these women
14 with drugs, manipulated them, assaulted them, intimidated them
15 and threatened these women to keep the money coming in all
16 within the Howard Johnson hotel. This is not a case about
17 voluntary prostitution.

18 This is not a case about a man who bought sex from a
19 woman who willingly sold it. This is a case about a man,
20 Faizal Bhimani, who bought and traded for sex with women whom
21 he knew were being trafficked, whom he knew were being beaten
22 and who were scared and who were addicted to drugs. Bhimani
23 provided a safe place for pimps and drug dealers and actively
24 helped them to avoid law enforcement and succeed in their
25 criminal enterprises, and in exchange he got sex, he got money

1 and he made money for his family's business. And his employers
2 knew it. You will hear from witnesses who will describe
3 criminal activity at the Howard Johnson was so rampant they
4 could not possibly have missed it. You'll hear from employees
5 who were managed by Faizal Bhimani at the Howard Johnson who
6 saw drug dealers and pimps and prostitution staying at the
7 hotel, employees who told their manager, Bhimani, and his
8 manager, Nazim Hassam, what they saw, but nothing changed.
9 Why? Greed.

10 Even after Bhimani was arrested in 2017 and Nazim
11 Hassam took over the day-to-day operations of the hotel, drug
12 dealer after drug dealer were renting rooms in that back
13 hallway at the Howard Johnson. You will hear from law
14 enforcement officers who conducted search warrant after search
15 warrant at the hotel and seized drugs and materials used to
16 package and sell drugs. And at the same time, the other hotel
17 owned by Nazim Hassam, the Quality Inn, now the Pocono Plaza
18 Inn, was also notorious as a drug den. It still is. You will
19 hear from employees at that hotel about the drug dealing and
20 drug use that went on.

21 You will hear about police responding to multiple
22 overdoses involving guests, about search warrants and arrests
23 of drug dealers allowed to stay at the hotel for extended
24 periods of time while they were selling and even employees of
25 the hotel who were selling and using drugs while they were on

1 the clock. And the owner, Nazim Hassam, and the companies who
2 benefitted, Om Sri Sai and the Pocono Plaza Inn, cannot avoid
3 responsibility by pretending they didn't know. They cannot
4 hide their heads in the sand and claim they had no idea what
5 went on behind closed doors because the law says --

6 MR. DeSTEFANO: This is argument rather than opening
7 statement. I will object on that basis.

8 THE COURT: It's overruled. Go ahead.

9 MR. CAMONI: The law says no one can avoid
10 responsibility for a crime by deliberately ignoring what is
11 obvious. And I submit to you, ladies and gentlemen of the
12 jury, by the time you have heard from all of the witnesses and
13 review all of the evidence, it will become quite clear the
14 crimes at these hotels were blatantly obvious.

15 In this case two of the defendants are flesh and
16 blood people, and two of the defendants are corporate entities
17 or companies. Now, a company is not a solid real thing. It is
18 not something you can see or touch. You can see the buildings
19 where the companies employees work. You can see a logo, see
20 what a company builds, you can touch what they make or sell.
21 But the company itself only exists because the law says it
22 does.

23 Under the law a company can own property, make
24 contracts, do business, make money, and a company can also
25 commit crimes. See, a corporation can only act through the

1 flesh and blood people who are authorized to act on the
2 company's behalf to conduct the company's business. Those
3 people are called the company's agents. You will hear from
4 many of the agents of these companies, employees, people who
5 did the business of these companies. Those people are called
6 the company's agents.

7 If those agents, the employees and especially the
8 managers and owners and officers, people who make the decisions
9 about what the company will do and how it does business, people
10 like Faizal Bhimani and Nazim Hassam -- if those people through
11 whom the company acts commit a crime while acting on behalf of
12 the company in order to benefit the company, then the law holds
13 the company responsible for that crime.

14 So just as an employee who rents a room to a guest at
15 the hotel can earn money for the company, if that employee
16 commits a crime while doing his or her job and the crime is
17 intended to benefit the company, then the law also holds the
18 company responsible for that crime. So if the agent knows, the
19 company knows. What the agents do for the company, the company
20 is responsible for. That is what the evidence will show in
21 this case, ladies and gentlemen, that the agents, the
22 employees, knew that the agents and employees did on behalf of
23 the company engaged in activities to make the hotels available
24 for the purposes of the use, storage and distribution of
25 illegal drugs.

1 One of the crimes charged in this case -- two of the
2 counts in the indictment is that of maintaining a drug related
3 premises. Federal law makes it a crime to manage or maintain a
4 premises or a place for the purposes of drug dealing or storing
5 illegal drugs or using illegal drugs, but the government does
6 not need to prove that the drug dealing or drug use was the
7 defendant's sole purpose or only reason -- only use of the
8 property. So if that hotel rents out 50 rooms to law abiding
9 guests on a given night but knowingly makes one room available
10 to someone whom the defendants know is selling or using drugs,
11 that is enough. That is a crime.

12 If the defendants knowingly profited from drug
13 activities on their property or even just made the space
14 available for that use without getting paid a dime knowing that
15 it would be used for drug activity, that is a crime. That's
16 maintaining a drug related premises as charged in counts four
17 and five. That is exactly what the evidence will show that all
18 four of these defendants did and not just once. It happened
19 regularly at both hotels for years. Many of the governments
20 witnesses are criminals, people with long records, drug
21 addicts, unsavory characters to say the least, but the
22 government did not select the witness to these crimes, ladies
23 and gentlemen. The defendants did by hiring drug dealers and
24 users to work at the hotels, by allowing sex traffickers and
25 drug dealers and drug users free reign in their hotels. The

1 defendants' own actions determined who the witnesses would be
2 in this case.

3 Some of the witnesses you will hear from are women
4 who were trafficked at the Howard Johnson hotel, women who will
5 tell you about how their traffickers leveraged their addictions
6 against them, threatened them and their families, assaulted
7 them, raped them all to make them sell their bodies. Some of
8 this testimony will be difficult to listen to, but it is
9 important to hear because all of these victims have suffered
10 for someone else's profit including the defendants.

11 All of these victims knew Faizal Bhimani. Some of
12 them even had sex with him either because he paid for it or in
13 exchange for free or discounted rooms. You will hear that
14 Faizal Bhimani knew about the violence, about the fear, about
15 their misery, and you will hear that it did not make a
16 difference. He still had sex with them anyway. And Howard
17 Johnson still profited from them. Why? Greed. Greed for
18 money and for sex.

19 The government's evidence will prove beyond a
20 reasonable doubt that Faizal Bhimani and Om Sri Sai, the owner
21 of the Howard Johnson, knowingly participated in sex
22 trafficking, aided and abetted sex traffickers and conspired
23 with sex traffickers. The evidence will prove beyond a
24 reasonable doubt that Bhimani, Om Sri Sai and Nazim Hassam
25 conspired with drug dealers and maintained the Howard Johnson

1 as a drug related premises, and the evidence will prove beyond
2 a reasonable doubt that Bhimani, Om Sri Sai, and Nazim Hassam
3 conspired with drug dealers and maintained the Howard Johnson
4 as a drug related premises. The evidence will prove beyond a
5 reasonable doubt that Bhimani, Hassam and the Pocono Plaza Inn
6 maintained that hotel as a drug related premises, too. And
7 after all of the evidence has been presented, I will stand
8 before you again, and I will ask you at that time to return a
9 verdict of guilty on all counts.

10 I will ask you, and the evidence will demand that you
11 hold these defendants responsible not for the crimes of anyone
12 else but for the crimes that they committed in the name of
13 greed. Thank you.

14 THE COURT: Thank you, Mr. Camoni. Now, I will
15 remind the jury I told you in the preliminary instructions that
16 I had given you the statements of counsel are not evidence in
17 the case. It's what they anticipate the evidence will show and
18 prove in the opening statements, but there's not evidence. You
19 have not heard any evidence yet in this case. Mr. Brown?

20 MR. BROWN: Thank you, Your Honor. May it please the
21 Court, good morning, ladies and gentlemen. As I looked at the
22 evidence in this case, I kept coming back to one question, and
23 it's a question of why. So I looked up the question of why.
24 Why exposes purpose. It's the reason somebody does something
25 or something exists. Aristotle in the age of philosophers

1 called it Telos. Albert Einstein said if he had to solve a
2 science problem in an hour and his life depended on it, he
3 would spend 55 minutes answering the question of why because he
4 knew if he answered that question, he could solve that problem
5 in less than five minutes. Alfred Hitchcock, Martin Scorsese,
6 Steven Spielberg and now Chris Nolan all say the question of
7 why drives their movies. It moves the plot along. It draws
8 the audience in. It's the reason for their stories.

9 In criminal defense it's called mens rea or intent,
10 commonly referred to as motive. This is the defense's opening
11 statement, ladies and gentlemen. My name is attorney Bernie
12 Brown. I represent the accused, Faizal Bhimani, in this case.
13 On behalf of Mr. Bhimani, I want to thank you for your service
14 on this jury.

15 Now, you just heard from the government, and the
16 government accepted the burden, and they told you that they
17 will prove to you the charges in the indictment. I ask you
18 that you hold them to those promises, make them prove to you
19 each and every element of the offenses beyond a reasonable
20 doubt. As Judge Mannion said, that's not beyond all doubt or
21 to a mathematical certainty. I agree with that. It is a doubt
22 that arises in reasonable prudent people like yourselves that
23 would cause you to pause or hesitate when acting on a matter of
24 highest importance in your own life.

25 Buying a house, buying a car, going on an expensive

1 vacation, these are the type of matters that are -- have high
2 importance. An example I like to use in my cases is before you
3 came to court today, you got yourself ready and got in your
4 car. As you were driving to the courthouse, you asked
5 yourself, did I lock the front door and set the alarm. Now,
6 whether or not that front door is locked or alarm is set, quite
7 frankly whether or not you even go back and check it, you had a
8 reasonable doubt simply by asking yourself did I do it. So if
9 on any part of the evidence -- if on any parts of the testimony
10 that leads you to ask yourself, did he do it, did Faizal
11 Bhimani engage in human trafficking and drug trafficking and
12 operating a drug premises at the Howard Johnsons in
13 Bartonsville, Pennsylvania, between 2011 and 2017 when he was
14 arrested, then that is a reasonable doubt, and you must find
15 Faizal Bhimani not guilty.

16 Now, there are questions of why that will be answered
17 through the evidence, and you will have to choose that answer.
18 The first question is, why did these women choose to work as
19 prostitutes. The second one would be, why did drug dealers
20 sell drugs. Then why did they choose the Howard Johnson hotel
21 in Bartonsville, Pennsylvania, to operate out of. And then the
22 next question will be, why when they were arrested did they
23 turn to the government for plea deals and to provide evidence
24 against that Howard Johnsons. You heard attorney Camoni talk
25 about the evidence. He's going to tell you about these crimes

1 that a witness like Sirvonn Taylor committed or Thurman
2 Stanley. Ask yourself the question, why is the government
3 calling them and making a deal with them? Why is the
4 government investigating the Howard Johnsons? But there are
5 questions of why that they will not be able to answer. And
6 those questions of why will be, why did Faizal Bhimani allow
7 the criminal activity to go on at the hotel?

8 Why would his uncle when he was interviewed by
9 government say he didn't like women? Why would Mr. Bhimani
10 call the cops on the same people he's accused of participating
11 in this conspiracy with? Why would he then assist in
12 investigations with Ms. Lippincott and the Monroe County
13 District Attorney's Office providing them information, giving
14 them evidence, allowing them to set up stings at the hotels
15 even to the point of testifying against some of the
16 individuals?

17 And why if Mr. Bhimani was so greedy did he live in a
18 hotel room on the premises? Why did he live -- live in a hotel
19 room on the premises, and why doesn't the government show any
20 assets, any bank accounts, any property, any cars, any jewelry,
21 any debt that Mr. Bhimani had? Now, these are the questions
22 with the evidence, ladies and gentlemen. But as the Court
23 said, you are the sole judge of the facts, and you are the sole
24 judge of the testimony in this case. The point is that the
25 government has promised to prove to you these things beyond a

1 reasonable doubt. And if they do, then you should find Mr.
2 Bhimani -- you should find Mr. Bhimani guilty of charges. I
3 promise you through the evidence and through the testimony in
4 this case I will be able to show you where these areas of
5 reasonable doubt are and that you will have a question of why
6 at the end of this case.

7 All that we ask you is you sit back right now and you
8 wait until you hear all of the testimony and see all of the
9 evidence, and then and only then with your fellow jurors
10 scrutinize it with a watchful eye and a careful ear as if
11 someone you loved was on trial, and I am sure that when you do
12 that, you will ask -- still be asking yourself the question
13 why. And that's why when I come back in front of you at the
14 end of this case I will ask you to find Faizal Bhimani not
15 guilty of these charges. Thank you.

16 THE COURT: All right. Thank you, Mr. Brown. Mr.
17 DeStefano?

18 MR. DeSTEFANO: Good morning, ladies and gentlemen.
19 I'm Bill DeStefano. As you know from yesterday along with
20 Terri Pawelski, my law partner and colleague, we represent
21 Nazim Hassam, who you heard Mr. Camoni talk about, and the two
22 corporate entities, Om Sri Sai, whose only asset was the Howard
23 Johnsons motel and the Pocono Plaza Inn. Today here in the
24 courtroom with us is Mr. Hassam. Please stand. I know there's
25 partitions and whatever. Also here today is his wife, Mrs.

1 Hassam. Would you stand up, please? Now, she's here because
2 she is a substantial shareholder in the corporate entity Om Sri
3 Sai -- I slur that every time I say it -- and also lived on and
4 off in the Howard Johnson motel with her husband, Nazim Hassam.
5 The evidence will show, ladies and gentlemen, that that wasn't
6 a full-time thing.

7 They have family. Both Mr. and Mrs. Hassam grew up
8 or -- in a country in Africa. They are of Indian descent.
9 Their parents moved to Africa until they were about 20 years
10 old, and the country in Africa expelled all non-citizens. It
11 was Uganda -- did they come to both the United States and
12 Canada. The evidence will show Mr. Hassam is one of ten
13 children, who he and his twin brother, brought his family over
14 to the United States one by one, brother, sisters, mother --
15 his father died before he can get here -- to the United States.

16 And in the courtroom are some of Mr. Hassam's
17 brothers, sisters and relatives here supporting Mr. and Mrs.
18 Hassam in this case. Ladies and gentlemen, I am a lawyer, as
19 you know, as is Ms. Pawelski. And I have to tell you today is
20 my birthday. I was born October 6th, 1946, 74 years ago today.

21 And just by way of a little background, I spent the
22 first seven or eight years of my career which started in 1971,
23 nearly 50 years ago, doing the job that these folks here are
24 doing for the Department of Justice. I was a trial attorney
25 with the Department of Justice and assistant U.S. attorney.

1 After that first so many years -- I don't know whether it was
2 six, seven or eight, somewhere in that vicinity -- and from
3 that time forward, I've been on this side of the courtroom
4 representing both companies and individuals who were charged
5 with crimes.

6 Now, introduction out of the way, folks, let me just
7 take a few minutes and take you through what the evidence in
8 this case will show. Now, this is a sensitive matter, but I
9 think it's an important piece of evidence. The evidence is
10 that Mr. and Mrs. Hassam and Mr. Bhimani's family were
11 essentially raised in Africa. In Africa it's an alternate
12 universe than the United States. United States, 95 let's say
13 percent of the people are white, Anglo-Saxon or other European
14 descendants, all you folks fit into that category.

15 And unfortunately, the evidence will show that these
16 alleged pimps, drug dealers and prostitutes were all
17 African-American. But you ought to keep in mind, members of
18 the jury, that Mr. Hassam and his wife grew up in an alternate
19 universe where 90 percent of the people were black. So the
20 evidence will also show, and you won't hear any of these
21 so-called pimps, prostitutes or drug dealers say that they came
22 to the Howard Johnsons with a sign on their front of their --
23 of their shirts saying, prostitute, pimp, drug dealer. They
24 presented as African-American males and females largely,
25 largely.

1 So I think it's important, ladies and gentlemen, for
2 you to guys to realize that you don't have a situation here
3 where somebody who you know is a drug dealer and you are
4 saying, okay, I am going to rent you a room -- quite the
5 contrary -- or someone you know who was a pimp or a sex
6 trafficker. You heard Mr. Camoni say this case is not about a
7 -- not about prostitution. These folks are not charged with
8 prostitution.

9 Prostitution is not a federal crime. So if
10 prostitution was going on at either place, that's not at issue
11 here. What is at issue -- and Mr. Camoni is correct about this
12 -- is something more than mere prostitution. The element that
13 some or all of these young ladies -- primarily young ladies,
14 both black and white -- had to be forced, and these guys had to
15 know, know or act in reckless disregard that they were forced
16 somehow to be prostitutes, that they weren't doing it of their
17 own free will.

18 The evidence is -- I submit to you folks -- may show
19 that they were forced but will not show that they knew or
20 recklessly believed they were forced. Indeed, the evidence
21 will show that when they had a strong suspicion that even
22 prostitution was going on or that one of their room occupants
23 or guests was either using or selling drugs. They called the
24 police repeatedly. We pulled the incident reports from the
25 upper Stroud Area Township Area Police Department where these

1 hotels both sit in the Poconos, and time after time somebody
2 called because there was an incident, somebody got removed from
3 the room. The evidence will show that there was even a
4 do-not-rent list where somebody came to one of these motels,
5 primarily the Howard Johnsons, and acted in such a way that Mr.
6 Bhimani or Mr. Hassam thought was probably criminal or -- but
7 again, you don't know. The evidence is not going to show that
8 either individual and especially Mr. Hassam saw these drug
9 dealing or drug using incidents with their own eyes.

10 They'd be going on complaints from somebody or
11 suspicion or some other thing. But the evidence will show that
12 not only were the police called frequently whenever there was
13 something really potentially criminal or some belief they had
14 something was going on that wasn't proper or that at minimum
15 they put these people on the do-not-rent-to list. Okay. They
16 leave. If they come back, don't rent, don't rent. There's a
17 witness coming in, I believe, probably this afternoon, Sirvonn
18 Taylor that will testify, well, at first, I registered under my
19 own name for a couple times. He's not very specific, but then
20 he says, shortly after that, I had to get somebody else to go
21 in and register and get the room for me. Now, Mr. Taylor
22 probably didn't know about this list, or maybe he did. But why
23 in the world would he have to come in and get somebody else to
24 rent a room under his -- somebody else's name that he would
25 stay in if he wasn't put on the do-not-rent list, which he was?

1 So, ladies and gentlemen, two of you I think you ought to have
2 in your minds very clearly -- and I thank Mr. Camoni for making
3 this clear as he could to you -- but Mr. Hassam is not charged
4 with any of the sex trafficking offenses in this case. He's
5 not charged with sex trafficking or conspiracy to engage in sex
6 trafficking. What that means, ladies and gentlemen, is the
7 government doesn't have enough evidence to even bring before
8 you that he knew anything about or participated in or aided and
9 abetted sex trafficking. He simply is not charged with those
10 crimes.

11 The hotel is owned by Mr. and Mrs. Hassam. They're
12 both stockholders in the corporate defendant, Om Sri Sai. Mrs.
13 Hassam is not charged with anything, sex or drugs. So your
14 focus, ladies and gentlemen, when you hear this evidence coming
15 in is that it simply does not pertain to Mr. Hassam if they are
16 talking about sex trafficking. They're talking about
17 prostitution, which is, I guess, a part of sex trafficking, but
18 a separate offense. He is only charged -- he's the company --
19 is only charged with the drug offenses, and I will go one more
20 step, ladies and gentlemen.

21 The government's evidence is going to relate to
22 alleged drug dealers or even actual people who sell drugs
23 coming in while Mr. Hassam was shorthanded, Faizal Bhimani was
24 no longer employed -- his employment ceased when he was
25 arrested by the police in 2017. So you got late 2017, 2018,

1 2019, maybe even into 2020 where Mr. Hassam unfortunately -- he
2 hired other people to work at the motel, but he had to take a
3 more active role in those years because his relative, Mr.
4 Bhimani, was no longer working for the Howard Johnson. The
5 evidence will show that Mr. Bhimani didn't even manage the
6 Pocono Plaza Inn approximately four miles down the street in
7 Stroudsburg.

8 The evidence will show that that property was managed
9 by a lady by the name of Janet Bush, whose daughter, Jennifer
10 Bush, was employed as a bartender in the Pocono Plaza. You
11 will hear evidence from Mrs. Bush, the manager, is that if
12 there were any incidents of prostitution, drug dealing or they
13 had to call the police -- and there were many at the Pocono
14 Plaza -- they didn't even tell Mr. Hassam about that. They
15 were afraid he would get nervous, oh, my God, what is
16 happening. They didn't even tell him about that.

17 Yet, Mr. Hassam and his company, his other company,
18 Pocono Plaza Inn, a/k/a, Quality Inn, is charged with managing
19 a drug premises, not sex, drug premises at the Pocono Plaza
20 Inn. How's that? They don't tell him. He's not living there.
21 He's not the manager. The manager doesn't even tell him what's
22 going on. He comes to collect the money maybe once a week or
23 in the morning, how is everything going, very good, and he goes
24 home or he goes back to the other motel where he lives
25 part-time -- with his wife part-time. So, members of the jury,

1 the other thing is we have to understand the premises here, and
2 I'm going to ask Kevin Siegel -- I will introduce Kevin Siegel
3 to you. He's our technical assistant here at trial. I will
4 ask him to show if you would the government's exhibit 1 for the
5 jury, which is the Howard Johnson hotel. That's government 1.
6 It's the front of the Howard Johnson motel.

7 However, what that shot does not show you and what
8 other evidence will show you that that premises is a sprawling
9 premises of approximately 160 rooms on two separate levels, 160
10 rooms, and that all of this so-called prostitution, which he's
11 is not charged with, sex trafficking -- which he's not charged
12 with, but drug -- supposed drug dealing or drug usage took
13 place way in the back. Now, Kevin, can you show some shots of
14 the whole motel just to give the jury a little idea of what
15 they're dealing with here? A couple more, Kevin. Stop there.

16 The front, ladies and gentlemen, the evidence will
17 show these photos show upfront where the street is 611, but the
18 drug activity took place in smoking rooms way in the back. So
19 somebody comes in, checks in upfront, that's where the front
20 office is. That's where the lobby is, bar and restaurant and
21 whatever is. And then because it's so far -- it's a long walk,
22 they get back in their car, and back they go to the back of the
23 motel, and this is where this drug activity and alleged sex
24 trafficking took place. There's no surveillance cameras back
25 there, certainly not inside the rooms and none outside of the

1 rooms. So I ask you as you're listening to this evidence and
2 you're appreciating the size and scope of this property, how is
3 Mr. Hassam, who doesn't check people in, he lives there
4 part-time, he lives upfront, one of the front rooms, or his
5 wife know or apprehend what might be going back there on a
6 given night? Sure, if somebody says there's a fight in the
7 parking lot or, hey, looks like there's some drug trafficking,
8 of course, call the police, that's what they did. Other than
9 that, how is he supposed to know this activity is taking place
10 dark at night? He's probably in bed.

11 And unless somebody comes to them, unless the cops
12 come -- now, the cops patrol, ladies and gentlemen. The
13 evidence will show the Upper Stroud Area police force patrols
14 all around looking for, surveilling for drug dealers. Okay,
15 good. I think that's what they are supposed to do. How does
16 that come back to Mr. Hassam? And because Mr. Hassam is the
17 Howard Johnsons property, he's part owner with his wife, if
18 other silent partners you will see as well -- but how does that
19 come back to the hotel itself?

20 Ladies and gentlemen, the same situation is true --
21 you can take that picture down -- but the size of the Pocono
22 Plaza Inn down the street four miles away from the Howard
23 Johnson is the same, and the layout is the same, and the
24 testimony will show that this drug activity which he and the
25 Pocono Plaza Inn are charged with, again similarly took place

1 in the back at night, police patrol. But who is waking Mr.
2 Hassam up four miles away there and telling him what's going
3 on? Janet Bush will tell you they didn't bother. They wanted
4 to keep that from him. So, members of the jury, as everybody
5 has told you, including Mr. Camoni and the judge and Mr. Brown,
6 you ought to keep an open mind.

7 You ought to view the evidence -- because I am
8 arguing to you here, what Mr. Camoni said to you, who was
9 arguing to you a lot, even what Mr. Brown is arguing is not
10 evidence. Your oath as jurors is to follow the evidence, and
11 unless that evidence convinces you beyond a reasonable doubt --
12 beyond a reasonable doubt, your duty as jurors is to return a
13 not guilty verdict that I respectfully submit you I will argue
14 to you in more detail that your verdict as to Mr. Hassam and
15 your verdict as to Mr. -- as to the two corporate entities
16 ought to be not guilty, not guilty, not guilty. Thank you very
17 much, folks.

18 THE COURT: Thank you, Mr. DeStefano. All right,
19 ladies and gentlemen, we're going to take a morning break to
20 let you use the facilities and stretch a bit. You will hear
21 admonitions from me all the time. You're to keep an open mind.
22 You are not to form any opinions. You have not heard even one
23 piece of evidence in this case yet, not one. All right. No
24 research of any kind concerning anything you heard, any
25 terminology, any locations, places, anything of that nature.

1 You're not to speak with anyone about the case including among
2 yourselves. If anyone were to try to talk to you about the
3 case, you must advise us of that immediately. All right. See
4 you back in here about ten to 15 minutes. All right.

5 (A brief recess was taken.)

6 THE COURT: Looks like we will break for lunch. It's
7 almost noon. There's electronic problems. It looks like it
8 will take some time to get resolved. It doesn't make sense for
9 us to bring the jurors back to start something at 20 after 12.
10 So we will break now for lunch. If it's okay with counsel,
11 rather than bring the jury back, I will advise of them of the
12 admonitions, don't do any research, talk to anybody, and tell
13 them to be back here at 1:00. Does that work for everybody?
14 All right. That's what we will do then. See you all at 1.

15 (A lunch recess was taken.)

16 THE COURT: All right. Welcome back. Ms. Roberts?

17 MS. ROBERTS: Thank you, Your Honor. The government
18 is going to call F.B.I. special agent Will Doherty.

19 WILLIAM DOHERTY, called as a witness, being duly
20 sworn, testified as follows:

21 DIRECT EXAMINATION

22 BY MS. ROBERTS:

23 Q. Good afternoon, sir. Can you please state to the jury how
24 you're employed?

25 A. Yes, good afternoon. I'm a special agent with the F.B.I.

1 located in the Philadelphia division.

2 Q. And how long have you been with the F.B.I.?

3 A. It will be nine years next April, so eight years as of
4 today.

5 Q. What do your current job duties include?

6 A. As a special agent, I'm assigned to a violent gang squad
7 in Philadelphia. We as in gangs work with the Philadelphia
8 Police Department and other local law enforcement agencies
9 combating narcotics sales, firearms sales, drug trafficking
10 both in Philadelphia and in the Eastern District of
11 Pennsylvania.

12 Q. Prior to working at the Philadelphia office, where were
13 you located at?

14 A. The Philadelphia office has several resident agencies, one
15 of them being the Scranton resident agency. I was assigned
16 there as of September 2012.

17 Q. So how long were you actually at the Scranton resident
18 office.

19 A. Approximately September 2012 until October 2015.

20 Q. While you were in Scranton working with the F.B.I., what
21 did your job duties include at that point?

22 A. I was assigned to the criminal branch of the F.B.I. as
23 opposed the national security branch. The primarily focus was
24 as a member of the Safe Streets Task Force, Scranton -- the
25 office here has a -- it's called the Steamtown Safe Streets

1 Task Force, so it investigates violent crime and gangs.

2 Q. And can you just briefly describe for the jury what your
3 educational background and your training is for the position
4 that you have with the F.B.I.?

5 A. I have a bachelor's in political science. I was an
6 Airborne infantry team leader with the 82nd Airborne prior to
7 serving in this capacity as an agent. I was also employed by
8 the D.E.A. in Baltimore, Maryland as a support employee doing
9 technical and administrative functions. And then when I became
10 an F.B.I. agent in 2012, I attended the F.B.I. academy at
11 Quantico. It was approximately 20 weeks long. It involved
12 firearms training, legal training, process training and other
13 forms of training that you would see in a regular police
14 academy.

15 Q. While working with the F.B.I. office in Scranton, did you
16 participate in any type of investigations relating to gang
17 activity in the Middle District of Pennsylvania?

18 A. Yes, I did.

19 Q. Can you describe for the jury what was that investigation?

20 A. In early 2014 I initiated an investigation in Monroe
21 County in the Poconos. The investigation targeted a gang known
22 as the Black P. Stones, which is a Blood set based out of
23 Chicago, but it expanded into New York City and from New York
24 City into the Poconos.

25 Q. How did you actually become interested in investigating

1 this gang, the P. Stones?

2 A. In early 2014, I believe it was January, there was a drive
3 by shooting in -- I believe it was in Stroudsburg, maybe East
4 Stroudsburg, and during this shooting, an innocent man was shot
5 and killed and they identified that the --

6 MR. BROWN: Objection, Your Honor, relevance.

7 THE COURT: Overruled. It's background information.
8 Go ahead.

9 THE WITNESS: And during the course of the
10 investigation -- subsequent investigation by the Pennsylvania
11 State Police and by local law enforcement, they determined that
12 the gang -- the Black P. Stones, the members of this gang were
13 involved in the drive by shooting. And subsequently to that,
14 there was a news article by the Pocono Record that detailed the
15 influx of Black P. Stones from the New York City area into the
16 Stroudsburg Pocono area.

17 BY MS. ROBERTS:

18 Q. So once you started collecting information on the Black P.
19 Stones, what was the focus of your investigation?

20 A. Traditionally, the Safe Streets Task Force, we target
21 narcotics trafficking, firearms trafficking and conspiracy
22 charges. But we identified in this investigation right away
23 that there was a significant human trafficking element with
24 this gang and the activities they were conducting.

25 Q. And when you say human trafficking, can you explain to the

1 jury what you're talking about when you say human trafficking?

2 A. So there's a misconception between human trafficking and
3 prostitution. Prostitution traditionally is a commercial sex
4 act between two individuals -- can be more -- but traditionally
5 two individuals -- but human trafficking, the element there is
6 that --

7 MR. BROWN: Objection, Your Honor. Calls for a legal
8 conclusion.

9 THE COURT: Overruled.

10 THE WITNESS: The difference between human
11 trafficking is that there's the sex act but it's done with the
12 -- or under the threat of violence, threat of violence, force
13 or coercion by another person not engaged in the sex act.

14 BY MS. ROBERTS:

15 Q. So in this particular investigation when you were looking
16 into the P. Stones for human trafficking or sex trafficking as
17 you're describing, were you looking for women who were chained
18 to a bed or chained in a basement?

19 A. That wasn't our primary goal. If we came across that, I'm
20 sure we would have investigated appropriately. In this case
21 what we found were the girls that were being trafficked in this
22 case, they started off underage, high school aged, and they
23 were addicted or they were provided narcotics as essentially a
24 payment so they would engage in the sex acts, and then members
25 of the Black P. Stones would provide them narcotics as payment.

1 Once you're hooked on opium, heroin, pain medication, once
2 that happens your body develops the addiction to it, and it's a
3 survival mentality where you need to do anything you can to get
4 that next fix or that next hit.

5 Q. What did you do to initiate your investigation? What
6 steps did you take?

7 A. One of the first steps was to meet with local law
8 enforcement. I met with the acting chief of police at Stroud
9 Area Regional Police Department, and I met with the detectives
10 from the Monroe County D.A.'s office, detectives from Pocono
11 Mountain Regional and homicide detectives from Pennsylvania
12 State Police. I just spent the first few weeks gathering
13 information on the P. Stones, who the hierarchy was, who there
14 leaders were, where they were based out of, residences or
15 hotels and their main function as a gang. Once I had a good
16 understanding, I opened an F.B.I. investigation and proceeded
17 to essentially recruit law enforcement officers both from the
18 D.A.'s office, Pennsylvania State Police and the local larger
19 police departments that were in the Poconos and together using
20 their institutional knowledge of individuals and gang members
21 in the Poconos, we established an ad hoc task force to target
22 the P. Stones and to eliminate the threat they posed to not
23 only to high school aged kids but girls who were out of high
24 school but were being trafficked.

25 Q. How were you able to locate specifically where some of

1 these individuals were?

2 A. Back in 2014, the website Back Page was functional and it
3 was operational. It's an open source website similar to
4 Craig's List. You're allowed to search by region. You can
5 search for keywords, phone numbers. And in this case Back Page
6 was the primary means of advertising for the P. Stones -- by
7 advertising I mean advertising girls to do -- to engage in
8 these sex acts. So the first step was to identify who these
9 females were, trying to identify common phone numbers and then
10 to subpoena Back Page for pertinent information.

11 Q. Can you describe for the jury what types of investigative
12 techniques that you used throughout the investigation to
13 collect information and collect evidence?

14 A. As F.B.I. we bring a wide range of resources to the task
15 force and to the safe streets resources. We provide manpower
16 resources and financial resources and technical resources.
17 During this investigation, we utilized all of them. We
18 provided additional manpower to understaffed law enforcement
19 agencies to surveil potential locations where the P. Stones
20 were operating. We provided other technical resources to set
21 up what we call a human trafficking sting, recording equipment,
22 provided money for narcotics, controlled narcotics buys, for
23 controlled firearms buys using a confidential source, and we
24 provided -- or we obtained grand jury subpoenas for information
25 from Back Page, from hotels and other businesses in the Pocono

1 region.

2 And then one of our biggest tools is just our ability to
3 interview people, both victims and coconspirators, what we call
4 subjects. As an F.B.I. and as law enforcement, it's being able
5 to interview someone, talk to them, get them to speak against
6 their own self interest or to provide information that they may
7 be embarrassed to talk about is really how we make our cases is
8 direct interviews of witnesses, victims and subjects.

9 Q. In this particular investigation, were you able to conduct
10 some of those interviews with women and with some of the pimps?

11 A. Yes, that's correct.

12 Q. Were you able to determine during your investigation where
13 the P. Stones were mainly operating out of?

14 A. We identified hotels in the Pocono region, Stroudsburg,
15 East Stroudsburg and along the I. 80 corridor between the New
16 Jersey boarder and roughly I. 380.

17 Q. I'm going to show you for identification purposes exhibit
18 1. It should pop up on your screen.

19 A. I see it.

20 Q. Do you recognize what Government's Exhibit 1 is?

21 A. That is the Howard Johnson hotel, and that is the front
22 entrance.

23 Q. And was that one of the hotels that the P. Stones were
24 operating out of based upon your investigation?

25 A. Yes.

1 MS. ROBERTS: Your Honor, the government is going to
2 request that Government's Exhibit 1 be moved into evidence.

3 THE COURT: Any objection?

4 MR. BROWN: No objection.

5 MR. DeSTEFANO: No.

6 THE COURT: It's admitted.

7 BY MS. ROBERTS:

8 Q. I'm also going to show you just for identification
9 purposes Government's Exhibit 34. Do you recognize what's
10 Government's Exhibit 34?

11 A. Yes, that's a hotel in Stroudsburg. I remember it as the
12 Quality Inn. It's clearly labeled the Pocono Plaza Inn.
13 During my time in this investigation, it was known as the
14 Quality Inn.

15 Q. Was that also one of the hotels in your investigation
16 identified as being where the P. Stones were operating out of?

17 A. That's correct, it is.

18 Q. Okay. Were there also other hotels that they -- the P.
19 Stones worked out in the Pocono area as well?

20 A. Yes, there were.

21 Q. Approximately how long did your investigation continue
22 for? You stated -- you testified that it started in early
23 2014.

24 A. The homicide, I believe, was in January of 2014. I
25 believe I opened the investigation in -- officially in March of

1 2014, and then it continued past when I departed -- when I
2 transferred to the Philadelphia office, which was in October of
3 2015. So my role in the investigation was roughly a year and
4 eight months or a year and a half.

5 Q. As a result of the part of the investigation that you did,
6 what did you do?

7 A. Once we identified who the main players were in this
8 investigation, the subjects, the hierarchy, one of the first
9 steps was to try to mitigate the risk to some of these girls
10 being trafficked. We decided to collectively work with the
11 task force to set up what we call a human trafficking sting
12 operation.

13 Q. And based upon that, were you able to present information
14 to a federal grand jury?

15 A. That's correct. Based on interviews, our surveillance
16 operations as a result of grand jury subpoenas and this
17 targeted enforcement operation of the P. Stones during the
18 human trafficking sting, I was able to present to the grand
19 jury.

20 Q. And were you able to actually indict or criminally charge
21 individuals based upon your investigation?

22 A. That's correct, several.

23 Q. Do you remember the names some of those individuals you
24 charged based upon this investigation.

25 A. I do.

1 Q. What are they?

2 A. We identified Sirvonn Taylor, the leader the Black P.
3 Stones in the Poconos. Sirvonn Taylor was indicted. We
4 identified a relative of his, Arty Taylor. He was also
5 indicted for the same offense.

6 Q. What offenses were they?

7 A. For human trafficking. Within the gang we identified a
8 sub organization. It was called Sev Squad, Sev being short for
9 Seven Squad. And that was headed by Jose Velazquez, Junior.
10 His street name was Sev, and within this Sev Squad we
11 identified Jamiell Sims. We identified Salena Bayer-Davis and
12 Sheryl Patishnock all being involved and all being indicted
13 except Sheryl Patishnock. She was not indicted.

14 Q. And were you able to identify any other individuals based
15 upon your investigation who were not in the actual P. Stone
16 gang but were also involved in the human trafficking and drug
17 trafficking?

18 A. Yes, the during the human trafficking sting we also
19 arrested Thurman Stanley, who went by the street name of Black.

20 Q. I'm going to show you Government's Exhibit 10.

21 A. I recognize him.

22 Q. Do you recognize what Government's Exhibit 10 depicts?

23 A. That is Sirvonn Taylor.

24 Q. I am going to show you Government's Exhibit 11.

25 A. That's Arty Taylor.

1 Q. Government's Exhibit 98?

2 A. The individual on the left wearing the backwards black
3 hat, and prominently displayed on his shirt is the word east.
4 That's Jose Velazquez, Junior, street name Sev. In the green
5 shirt with the white Nike swoosh is Arty Taylor.

6 Q. Government's Exhibit 13.

7 A. That is Salena Bayer-Davis.

8 Q. Government's Exhibit 19.

9 A. That is Thurman Stanley.

10 Q. Government's Exhibit 12.

11 A. Sheryl Patishnock.

12 Q. Government's Exhibit 18.

13 A. Kenya Evans.

14 MS. ROBERTS: Your Honor, the government requests,
15 Government's Exhibit 34, 10, 11, 98, 13, 19, 12 and 18 be
16 entered into evidence.

17 THE COURT: Any objections?

18 MR. BROWN: No objection.

19 THE COURT: Mr. --

20 MR. DeSTEFANO: No objection.

21 THE COURT: It's admitted.

22 BY MS. ROBERTS:

23 Q. Do you remember the timeframe that was charged for the
24 drug and sex trafficking investigation?

25 A. I believe the scope of the indictment was from 2000 -- end

1 of 2010, early 2011 all the way up to 2014.

2 Q. While you were investigating these crimes, was your focus
3 on the actual locations where this criminal activity occurred?

4 A. No, our primary focus was on the females underage and
5 overage that were being trafficked and to mitigate the risk
6 against them as soon as possible.

7 Q. And at some point during the investigation while you were
8 still in Scranton, did that primary focus from the actual
9 individuals shift?

10 A. Yes, it did.

11 Q. And how did that shift? Can you explain that to the jury?

12 MS. PAWELSKI: Objection, basis for knowledge.

13 THE COURT: It's overruled.

14 THE WITNESS: I can't hear.

15 BY MS. ROBERTS:

16 Q. Can you explain to the jury how that shift occurred while
17 you were working in Scranton?

18 A. Yes, around the same time -- again, I transferred from the
19 Scranton resident agency to the Philadelphia office
20 approximately October -- end of September, early October 2015.
21 During -- around that same time my partners in this
22 investigation, once the hierarchy of the P. Stones was charged
23 and arrested, the investigation shifted towards where the P.
24 Stones had been functioning and working backwards to target
25 these locations, these hotels. And around that at the same

1 time is when I departed and no longer had a role in the
2 investigation, but I had knowledge that shift was in process.

3 THE COURT: Before the next question, Mr. DeStefano
4 and Ms. Pawelski, only one counsel handles each witness.

5 MS. PAWELSKI: My apologies.

6 THE COURT: So only -- it's not everyone, okay.

7 BY MS. ROBERTS:

8 Q. Did other members of the Scranton resident office take
9 over that portion of the investigation after you got
10 transferred to the Philadelphia office?

11 A. Yes, they did.

12 Q. Do you recall who that was?

13 A. Task force officer Chris Shelly, who is a detective or
14 police officer from the Stroud Area Regional Police Department,
15 and then trooper William Patton, who was with Pennsylvania
16 State Police.

17 Q. You said was with the Pennsylvania State Police?

18 A. Yeah, that's correct. He has retired since.

19 MS. ROBERTS: Your Honor, I have no further questions
20 for this witness at this time.

21 THE COURT: Mr. Brown?

22 MR. BROWN: Thank you, Your Honor.

23 CROSS EXAMINATION

24 BY MR. BROWN:

25 Q. Agent Doherty, my name is attorney Bernie Brown. I

1 represent Faizal Bhimani, and I have a couple questions. Is it
2 true that you began your investigation and did a report on
3 September 17th of 2014? Do you recall that?

4 A. Not the specific report.

5 Q. Can we bring up Bates 2189, please? Is it --

6 THE COURT: Hold on. That will be brought up only to
7 the witness.

8 MR. BROWN: Right. I was going to ask a foundational
9 question. In the course of your training and experience, you
10 write reports as a result of what you investigate, correct?

11 THE WITNESS: Correct.

12 BY MR. BROWN:

13 Q. Okay. And -- is there a report in front of you?

14 A. It's up.

15 Q. I would like you to look over that report. It's two pages
16 in length. When you're done with the first page, just let me
17 know, and then we'll flip to the second page.

18 A. Okay, second page, please. Could you go back to that
19 first page so I can get the transition? Okay. Back to the
20 second page.

21 Q. Does that refresh your recollection as to your report from
22 October of 2014?

23 A. As it's written there, yes.

24 Q. Yes, okay. What I want to talk about is what is written
25 there. And you had information that Thurman Stanley was

1 working out of and staying at the Howard Johnson in 2014,
2 correct?

3 A. That's what it says in the report. I can't recall what
4 the specific information was though.

5 Q. It's your report though, correct?

6 A. Correct.

7 Q. You wrote it?

8 A. Yes.

9 Q. Okay. That's your name at the bottom, by William Doherty
10 dated draft 10/12/14, correct, down at the bottom of the first
11 page?

12 A. The one I am looking at says 10/20/14.

13 Q. So in your report you write that you have information that
14 Thurman Stanley was staying at the Howard Johnsons, correct?

15 A. That's correct.

16 Q. Did you receive that information from hotel management?

17 A. I don't recall.

18 Q. So is it possible that you could have received it from the
19 management of Howard Johnsons?

20 A. I don't know that I ever received any information from
21 management at Howard Johnson. I am reluctant to say yes.

22 Q. So let me direct you to paragraph No. 2, the first
23 sentence.

24 A. I see it.

25 Q. Okay. Investigators received intelligence that Thurman

1 Stanley was at the Howard Johnson hotel room 145 in
2 Bartonsville. Did I read that correctly?

3 A. You did.

4 Q. You received information not only of where Mr. Thurman
5 Stanley was but what room number he was in, correct?

6 A. Yes, according to this report.

7 Q. Right. And could you have received that information from
8 anywhere else but the front desk or management?

9 A. Yes.

10 Q. Okay. Fair enough. And then you also received -- did you
11 go to the hotel?

12 A. So in this report it says that we conducted spot
13 surveillance -- sorry. Is this displayed?

14 Q. Yes.

15 A. In this report it says that we conducted spot surveillance
16 at the Howard Johnson but also says we conducted spot
17 surveillance at six other locations. Having not -- not -- not
18 recalling exactly from five years ago what our course of action
19 was, but reading this, we must not have seen the vehicle at the
20 Howard Johnson and gone to the other five hotels here to try to
21 see if the vehicle was there.

22 Q. So my first question, did you go to the Howard Johnson?

23 A. It says we did in this report, so I believe we did.

24 Q. Okay. You went to the Howard Johnson, and you conducted a
25 spot surveillance, correct?

1 A. Yes.

2 Q. Okay. And you looked for Thurman Stanley's car, correct?

3 A. Correct.

4 Q. And you did not find it there, correct?

5 A. I don't believe we did.

6 Q. Okay. Does your report say that you did not find Thurman
7 Stanley's car at the Howard Johnson, yes or no?

8 A. Can you switch to the second page real quick?

9 Q. No, it's on the first. The last paragraph, first line,
10 first sentence of that paragraph. That one right there.

11 A. Sorry. It keeps moving around here.

12 Q. Investigators were unable to locate the vehicle --

13 THE COURT: There's a question. Let the question --

14 MR. BROWN: I apologize, Judge.

15 THE WITNESS: No, it was not located at the hotel.

16 MR. BROWN: Fair enough.

17 BY MR. BROWN:

18 Q. And it was located somewhere else, correct?

19 A. That's correct.

20 Q. Then do you -- actually I'm going to stick with that
21 exhibit there since we have it. When you were talking about
22 the spot surveillance, there were six other hotels, correct?

23 A. As I am looking at it again. I see the last one is Stroud
24 Mall. That's not a hotel, so it would have been the Howard
25 Johnson plus four other hotels and a fifth location being the

1 Stroud Mall.

2 Q. Okay. So the first one would have been the Quality Inn,
3 correct?

4 A. That's how it's reported. That doesn't necessarily
5 reflect that's first hotel I went to.

6 Q. Okay. In your report you wrote -- the first name of a
7 hotel is the Quality Inn, yes or no?

8 A. That's correct.

9 Q. Okay. The second name is the Econo Lodge, yes or no?

10 A. Yes.

11 Q. The third name is Budget Inn, correct?

12 A. Correct.

13 Q. Then the fourth was the Howard Johnson, yes or no?

14 A. Yes.

15 Q. And the fifth was the Comfort Inn, correct?

16 A. Correct.

17 Q. So that was the information that you had of where Thurman
18 Stanley would run his drug and human trafficking operations out
19 of, correct?

20 A. Meaning room 145 or those six locations?

21 Q. Those six locations the reason why you would include those
22 in the report in -- when you're looking for spot surveillance
23 as to where Thurman Stanley is, is because you had information
24 that he was operating out of those hotels, correct?

25 A. In part.

1 Q. Well, isn't the point of your investigation on September
2 17th, 2014 to find out where Thurman Stanley is?

3 A. Yes.

4 Q. Okay. And so you go to the -- you have information that
5 he's at the Howard Johnson, correct?

6 A. Correct.

7 Q. And the reason why those names that I just went over with
8 you are included in your report would be because you had
9 information that he was also working out of the Quality Inn,
10 correct?

11 A. Not necessarily on this Friday, September 17th.

12 Q. Okay. Then why would you on September 17th when trying to
13 locate Thurman Stanley go to the -- include these six other
14 hotel rooms -- or six other hotel names in your report, sir?

15 A. As part of our investigation and preparation for our human
16 trafficking sting, we made sure that we gathered as much
17 intelligence, and part of that for me as a newer F.B.I. agent
18 at the time was to work with Pennsylvania State Police and
19 other county detectives from other areas that the Scranton
20 resident agency covers and we'd conduct human trafficking
21 stings in those locates just so I can gain the experience and
22 know how to run a successful one. As part of my process for
23 checking these six locations, as part of my training into this
24 investigation, these are hotels that we conducted other
25 surveillances at and other prostitution stings at the county

1 level where I participated. So these were known locations
2 where women would go or would be frequented by either narcotics
3 traffickers or prostitution -- or prostitutes, excuse me.

4 Q. Right. In particular Thurman Lamont Stanley?

5 A. In particular what?

6 Q. In these locations where you are trying to find out where
7 Thurman Stanley is, you include them in there for that reason,
8 yes or no?

9 A. It's not a yes or no question for this particular event.

10 Q. Sir, I'm asking the questions. It is a yes or no
11 question. Did you include it in your report when your
12 investigators received intelligence that Thurman Stanley was at
13 the Howard Johnson's, you included in a report looking for
14 Thurman Stanley?

15 A. Correct.

16 Q. Did you yes or no include those names in there in your
17 surveillance of trying to find out where Thurman Lamont Stanley
18 was?

19 A. It would make sense so, yes.

20 Q. Okay. Thank you. Now, you eventually find out where
21 Thurman Lamont Stanley is in your surveillance, correct?

22 A. I believe I find out where his vehicle is. I don't know
23 that he's in that location.

24 Q. Okay. So you find out that his vehicle is located at 212
25 Lackawanna Avenue in East Stroudsburg P.A., correct?

1 A. Correct.

2 Q. Okay. You drive past the residence. You see it's there.
3 You find out who the residence belong to, correct?

4 A. The only reason why I'm struggling on this answer is
5 because I don't know if the residence belonged to Michelle
6 Oswald or just based on the license plate information for that
7 Chevy S. U. V. So I don't know the answer to that.

8 Q. Did you have information that Thurman Stanley was inside
9 that residence?

10 A. I did not.

11 Q. Okay. So you didn't do anything more there?

12 A. If I did, I would have reported it, so I'll say no.

13 Q. Okay. No arrest was made for human trafficking or drug
14 activity of Thurman Stanley?

15 A. Not on Friday, September 17th.

16 Q. How about -- do you recall doing or trying to make a
17 controlled purchase on February 20th, 2015?

18 A. From this location?

19 Q. No, just in your investigation. Sorry.

20 A. I'm sure there's a report documenting that I did one so --

21 Q. There is.

22 A. Yes, I do recall but not the pertinent details.

23 Q. And it is Bates 2131.

24 THE COURT: Mr. Brown, when you refer to a document
25 aside from whatever the Bates number is, do you have it marked

1 as a defense exhibit for purposes of identification?

2 MR. BROWN: I didn't.

3 THE COURT: You need to mark them. Anything you show
4 as a defense exhibit just for identification purposes so our
5 record is clear as to what the document is, all right.

6 MR. BROWN: Okay. So then I will mark Bates 2189 --

7 THE COURT: Is that the one just previously showed?

8 MR. BROWN: Previously showed -- 2190, surveillance
9 from September 17th, 2014.

10 THE COURT: As?

11 MR. BROWN: Defendant's Exhibit No. 1.

12 THE COURT: Okay.

13 MR. BROWN: And I will mark this attempted controlled
14 purchase on February 20th, 2015 as Defendant's Exhibit 2, Your
15 Honor. It would be Bates 2131 to 2232.

16 THE COURT: Okay.

17 BY MR. BROWN:

18 Q. Agent Doherty, was there an attempted controlled purchase
19 made on this date as it related to your investigation?

20 A. Based on my reading of the first page, that is correct.

21 Q. And is it true that you guys had a confidential informant
22 meet a known drug trafficker by the name of Anton Woodson in
23 order to conduct a controlled purchase?

24 A. Again, based on this report that appears to be accurate.

25 Q. Okay. And when directed to go back to the Howard Johnson

1 at Bartonsville in order to obtain that, the investigation and
2 controlled purchase was terminated, correct?

3 A. Correct.

4 Q. And so that means no purchase was made on that date,
5 correct?

6 A. Can you just go to the second page so I can just make
7 sure?

8 Q. Sure.

9 A. That is correct.

10 Q. Okay. Thank you. And you testified on direct examination
11 that you've testified before in relation to your investigation
12 into the P. Stones?

13 A. Just testified in grand jury.

14 Q. Right. During that grand jury testimony, is it true the
15 information from your investigation specifically focused on the
16 P. Stones gangs and their operation on that date?

17 A. Correct.

18 Q. And did you say during your testimony that the P. Stones
19 operated out of numerous hotels in or about the Stroudsburg and
20 Monroe County area?

21 A. Correct.

22 Q. Okay. Did you testify that your investigation revealed a
23 large drug sale that occurred out of the Super 8 motel in East
24 Stroudsburg?

25 A. I am sure I did. I don't recall the details though.

1 Q. But you did?

2 A. Yeah, I'm sure I did.

3 Q. Did you also testify that the main sales for the P. Stones
4 also occurred out of that same Super 8 motel?

5 A. You say main sales?

6 Q. Sorry. The main drug sales that occurred for the
7 operation occurred out of the Super 8 Motel.

8 A. Without having the transcript in front of me, I'm sure I
9 did. I don't remember the details though.

10 Q. Is that a yes?

11 A. Do you have a transcript I can review?

12 Q. I do.

13 MR. BROWN: I will mark the entire transcript, Your
14 Honor. I will get you the pages, but right now I have a
15 specific page of 2131. That would be the Bates number -- lines
16 21 to 24. I will mark that as Defendant's Exhibit No. 3.

17 THE COURT: Okay.

18 MR. BROWN: Thank you, Judge.

19 THE WITNESS: Just to clarify, I am reading page 82?

20 MR. BROWN: Yes, page 2131, lines 21 to 24.

21 THE COURT: Let me just ask you. You thought the
22 previous Defendant's Exhibit 2, the 302 you showed him was
23 Bates exhibits 2131 to Bates 2132. If that's the case, how can
24 this be 2131?

25 MR. BROWN: Excuse me. I have 2231.

1 THE COURT: As to No. 2?

2 MR. BROWN: As to No. 2. I apologize. I misspoke.
3 Did you have a chance to review your grand jury testimony?

4 THE WITNESS: As I have read line 21 through 25, yes.

5 BY MR. BROWN:

6 Q. And is it true that the P. Stones, in particular Jose
7 Velazquez mainly operated out of the Super 8 Motel in East
8 Stroudsburg?

9 A. That's what it says. I don't recall based on this page
10 the timing of when this information was provided, whether it
11 was indictment or following the human trafficking sting. I
12 don't have context of when this information she was providing
13 actually occurred.

14 Q. Okay. Well, go back to that first page. 2130. Grand
15 jury testimony September 22nd, 2015.

16 A. No, I get -- I know what I testified. I am testifying to
17 an interview I conducted with in this example Sheryl
18 Patishnock. I don't know the date of the information she was
19 providing.

20 Q. Fair enough. You don't disagree with what that says
21 there?

22 A. Correct.

23 Q. Do you know if any hotel managers like my client from the
24 Super 8 were indicted?

25 A. Were indicted?

1 Q. Yeah.

2 A. Not -- not to my knowledge.

3 Q. Did you testify that you also interviewed a Millie McKee?

4 A. Yes.

5 Q. And did you know that Millie McKee when she was
6 interviewed said that she was a prostitute and that she was not
7 human trafficked?

8 A. If you have the transcript I can review it.

9 Q. I'm asking did you know that?

10 A. That she said that to me?

11 Q. That she said that during an interview.

12 A. I don't recall her saying that to me. Again, if I had the
13 report to review, I can confirm it. But without that, I
14 wouldn't feel comfortable.

15 Q. So did you know that she -- Millie McKee said in her
16 interview that she was actually interviewed by her employer,
17 her pimp, and given the opportunity to make a decision whether
18 or not she wanted to become a prostitute?

19 A. I'm sorry. I am confused by your question.

20 Q. Did you know that Millie McKee said she was interviewed
21 and given a day or two to make a decision whether or not she
22 wanted to work for her employer, her pimp?

23 A. I don't recall the interview with Millie McKee. Just like
24 the surveillance report that I was shown earlier, any interview
25 I would have conducted would have either been completed --

1 documented in an F. D. 302 or a -- if there's another law
2 enforcement entity with me, they would have documented it. So
3 if it's reported in there, then I can review it and answer that
4 question. But without that, I just do not recall five years
5 later what she said to me.

6 Q. Okay. So then you also not recall Millie McKee -- did you
7 know that Millie McKee said she'd rather be paid in drugs than
8 money?

9 A. I just don't recall.

10 Q. Okay. You knew you were testifying here today, correct?

11 A. Correct.

12 Q. And you didn't take the opportunity to review any of your
13 302s or the grand jury report?

14 A. I did.

15 Q. Okay. You just don't remember as you sit here today
16 whether or not you asked those questions and she gave you those
17 answers?

18 A. That's correct.

19 Q. How about Salena Bayer-Davis, who you identified, do you
20 know she said she wanted to work for money?

21 A. I just don't recall.

22 Q. Okay. But you recall her being a prostitute for the P.
23 Stones?

24 A. That's correct.

25 Q. Did she also tell you she was voluntarily and made a

1 decision to enter the gang?

2 A. I don't recall.

3 Q. And that she made a voluntary decision to leave the gang?

4 A. I don't recall again five years later. I don't recall
5 anyone saying that they voluntarily left the gang. Just based
6 on gang initiation, that wasn't in our investigation, that
7 wasn't something that was feasible without significant
8 consequences. So I feel I would remember that. If I had the
9 report to review --

10 Q. How about your grand jury testimony?

11 A. That's fine.

12 MR. BROWN: 2168. This is still -- this is
13 Defendant's Exhibit 3.

14 THE COURT: This is 3?

15 MR. BROWN: This is Defendant's Exhibit 3. It's the
16 entire grand jury testimony, Your Honor. I apologize I don't
17 have the pages.

18 THE COURT: That's okay.

19 MR. BROWN: Just one minute, Your Honor. I think I
20 gave him the wrong page. I apologize. May I have a moment? I
21 just gave him the wrong number.

22 THE COURT: Sure.

23 MR. BROWN: I will move on.

24 BY MR. BROWN:

25 Q. Do you recall her saying that she wasn't being forced to

1 stay in the gang? Yes or no, do you recall her saying that?

2 A. Again, just going back through my interviews -- I
3 interviewed several individuals in this case, and I don't
4 recall anyone ever saying that to me -- but again going off of
5 general review.

6 Q. And let me ask you if you recall this. Do you remember
7 her saying the reason why she wanted to leave because it used
8 to feel like family but then she realized they didn't have her
9 back, meaning the P. Stones?

10 A. I remember that.

11 Q. And that was the reason why she was leaving the gang,
12 correct?

13 A. That makes sense, yeah.

14 Q. Okay. Does that refresh your recollection as to whether
15 or not she made a decision to leave the gang?

16 A. Again, these questions all make sense. I just -- I can't
17 say definitively.

18 Q. Right. As you sit here today?

19 A. As I sit here.

20 Q. You talked about Sheryl Patishnock?

21 A. Yes.

22 Q. Did she say she -- she knew Mr. Taylor since high school,
23 correct?

24 A. Sounds right.

25 Q. Okay. And that she chose to be in the gang, too, correct?

1 A. That sounds right.

2 Q. Okay. And did she say that she went through the
3 initiation and still wanted to be a member of the gang?

4 A. I don't remember that.

5 Q. Okay. How about -- did she say that she wanted to
6 voluntarily leave the P. Stones, too?

7 A. I don't know we would have asked in any interview with one
8 of the girls that were being trafficked -- I don't know we
9 would ask them did you want to voluntarily leave, and I don't
10 know -- they proffer that information, so I just don't recall.

11 Q. Okay. How about 2129? Does that refresh your
12 recollection? Did she attempt to leave and want to leave the
13 gang?

14 A. This grand jury testimony would have been a recollection
15 of my interview with her or one of my interviews with her.

16 Q. Correct.

17 A. In this instance, can I quote this or read this? When
18 Patishnock told Taylor --

19 THE COURT: Hold on. If we are showing him something
20 under rule 612, all right, you read it. And after you've read
21 it, you can answer his question, okay.

22 THE WITNESS: Okay.

23 THE COURT: This is not information that's admissible
24 other than 612 for refreshing recollection.

25 THE WITNESS: Would you mind repeating the question?

1 BY MR. BROWN:

2 Q. My question was, did Patishnock tell you she was leaving
3 -- she left the gang? It had to deal with her leaving the
4 gang.

5 A. From my recollection of this -- of my testimony from 2015,
6 she said she attempted to leave the gang.

7 Q. Right. And did she leave the gang to your knowledge?

8 A. I don't know.

9 Q. Okay. Fair enough. Did Patishnock also say she was
10 having sex for money?

11 A. It's not reflected in this page, but it was -- it was
12 information that we learned through our interviews with her,
13 yes.

14 Q. Yes, okay. So that's a, yes, she was having sex for
15 money?

16 A. Yes.

17 Q. And she would attribute this money to the gang, correct?

18 A. Correct.

19 Q. So she would have possession of the money, and she would
20 pay dues to the gang?

21 A. Yes, that's correct.

22 Q. Did you testify to her complaining about training a
23 recruit because she would rather make money for the gang? Do
24 you recall testifying to that?

25 A. Did you say training a recruit?

1 Q. Yeah, recruit -- training a recruit, so a new female to
2 come into the gang and engage in their prostitution operation
3 that -- did she -- did she complain about having to train a
4 recruit when she wanted and rather make money?

5 A. I know she discussed it. I just don't recall if she
6 complained about it.

7 Q. 2176.

8 A. What's the line again?

9 Q. 21 to 24.

10 MS. ROBERTS: I am going to object. The women are
11 going to testify. This is all based upon information that's
12 not even in evidence at this point. There's no impeachment
13 value in this case. There's no contrary statements.

14 THE COURT: No, it's overruled. He can question the
15 witness about his 302s or investigation that he conducted.

16 BY MR. BROWN:

17 Q. Did -- sorry. I don't know if you're done reading yet.

18 A. Okay.

19 Q. Okay. And so what you just read, did Ms. Patishnock say,
20 I'll make the money myself instead of -- sorry. I make the
21 money myself because I don't have time to make money and train
22 a bitch, too?

23 A. Yes.

24 Q. And is that recalling -- is that referring to her not
25 having time to train a recruit and that she would rather make

1 money?

2 A. Yes.

3 Q. And there was a Ms. Evans, Kenya Evans. Do you recall
4 talking to her and interviewing her?

5 A. Generally, not the specifics.

6 Q. Okay. Did she have sex for money, too?

7 A. Yes, she did.

8 Q. Did you testify based upon your time in the F.B.I. it's
9 common for people who are involved in illegal activities to --
10 for some reason to photograph the proceeds of their activities?

11 A. I'm sure I did.

12 Q. Okay. And based on your training and experience, why is
13 that common, and why would somebody do that?

14 A. In the social media world that we live in, and back in
15 2014, 2015 social media was still developing. But flashing
16 money was a sign of -- for lack of a better term -- street
17 cred. Obviously if you have little bills, you have little
18 street cred, and if you have hundred dollar bills and a large
19 stack of them fanned out, then it makes you look like a bigger
20 player, makes you fit the role that you want people to consider
21 you as.

22 Q. And so it is telling about a person's involvement in the
23 criminal activity such as prostitution or drug trafficking,
24 would you agree?

25 A. I would.

1 Q. Is it equally telling if somebody doesn't put pictures of
2 themselves on social media?

3 A. With money?

4 Q. With money.

5 A. It's telling that they are more careful in their actions.

6 Q. How about their lack of involvement? Would that be
7 telling also?

8 A. Is there -- I'm sorry.

9 Q. So is lack of photographs on social media with money in
10 your hand showing what type of big baller you are, big player
11 you are? Is that telling about an individual when you don't
12 see that?

13 A. If we know that they are a player and they don't post,
14 sure.

15 Q. In your investigation into the Howard Johnson and Faizal
16 Bhimani, did you find any Facebook posts that he had with
17 pictures?

18 A. My investigation was up until the indictment of the P.
19 Stones members. I was not around for the component with the
20 Howard Johnson specifically targeting the hotel.

21 Q. But you're here for the government, correct?

22 A. Correct.

23 Q. You are here testifying based on your knowledge of the
24 investigation, correct?

25 A. My direct knowledge, yes.

1 Q. And did the government ever provide you any Facebook
2 pictures of Faizal Bhimani with large money on Facebook?

3 A. No.

4 MR. BROWN: I have nothing further, Judge. Thank
5 you?

6 THE WITNESS: Thank you.

7 THE COURT: Ms. Pawelski?

8 MS. PAWELSKI: Thank you, Your Honor.

9 CROSS EXAMINATION

10 BY MS. PAWELSKI:

11 Q. Good afternoon, special agent.

12 A. Good afternoon.

13 Q. You were in Scranton for how long?

14 A. Approximately three years.

15 Q. And then you moved to Philly when?

16 A. I can't remember if it was September or October, but
17 around then 2015.

18 Q. 2014 to 2015 you moved to Philadelphia?

19 A. Say again.

20 Q. You were in Scranton in 2014 and you -- up until 2014, and
21 you moved to Philadelphia in 2015?

22 A. October 2015.

23 Q. Okay. I want to go back to something that you testified
24 earlier on with Ms. Roberts about your training at Quantico.
25 You stated you had training there. But I was wondering if you

1 can go into the little bit more detail about what type of
2 training you had at the F.B.I. in Quantico?

3 A. Broadly or --

4 Q. Broadly, sure.

5 A. Quantico is broken down in defensive tactics, firearms,
6 legal investigations, defensive driving.

7 Q. Let me stop you there. With respect to investigations,
8 was it part of your training to receive training on writing
9 reports?

10 A. Just generally what a F. D. 302 is --

11 Q. Why don't you tell the jury what is a F. D. 302?

12 A. F. D. 302 is a summary of an interview conducted with
13 anyone, a witness, a subject, victim, it can be a surveillance
14 report. It could be -- it can be pretty wide ranging. It's
15 kind of the catch-all for our interviews and our
16 investigations.

17 Q. Did you actually receive training at Quantico about
18 writing reports?

19 A. I don't know. You really get that in the field.

20 Q. Were you taught at Quantico it's important to write
21 accurate reports?

22 A. Yes.

23 Q. Extremely accurate reports?

24 A. Correct.

25 Q. Why is that?

1 A. Because five years later when you're on the witness stand
2 if you don't remember something, it's good to have a refresher.

3 Q. And it happened, right. So it's better to take it down
4 then and take it down accurately, correct?

5 A. Correct.

6 Q. Because there is a chance that those reports will be
7 discoverable to defense attorneys, correct?

8 A. Correct.

9 Q. Okay. Thank you. Now, you are actual F.B.I., you're an
10 F.B.I. agent?

11 A. Correct.

12 Q. And are you familiar with the case agents in this case,
13 and that would be William Patton?

14 A. I am, yes.

15 Q. And is William Patton an F.B.I. agent?

16 A. No, he's what we call a task force officer.

17 Q. What is that?

18 A. Again, going back to the safe streets when the F.B.I.
19 started the safe streets back in early 90s, the idea was to
20 have an organization like the F.B.I. to consolidate resources
21 with state and local partners, in this case Mr. Patton was a
22 task force officer, was a trooper with the Pennsylvania State
23 Police.

24 Q. Great. So his background was actually a Pennsylvania
25 state trooper?

1 A. Yes.

2 Q. And he did not go -- he did not attend Quantico and
3 graduate from the F.B.I., correct?

4 A. They have another national academy. I don't think he
5 attended that. He did not attend the special agent academy.

6 Q. As you did?

7 A. Correct.

8 Q. How about Christopher Shelly, the other agent who is not
9 at counsel table today, but are you familiar with Christopher
10 Shelly?

11 A. I am, yes.

12 Q. Great. Can you please tell us whether he's an F.B.I.
13 agent such as yourself?

14 A. No, he's not. He's a sworn task force officer which gives
15 him the same statutory authority as an F.B.I. agent, but he's
16 not a special agent.

17 Q. And I understand in your opinion he has the same
18 authority. But has he received all the same education and
19 training as you have?

20 A. I'm not sure if it's the same, no.

21 Q. Okay. I'm sorry. Did you say he was from the Stroudsburg
22 or did not -- did I not --

23 A. He's an officer with the Stroud Area Regional Police
24 Department.

25 Q. Okay. Thank you. I don't need -- let me ask you in your

1 grand jury testimony did you come back to Philadelphia to
2 testify in that case -- I'm sorry. Did you come back to
3 Scranton to testify in that case?

4 A. No, as I was reviewing my grand jury testimony, I saw the
5 date was September 22nd, 2015. So I would have still been here
6 and -- I would not have returned for that grand jury testimony.

7 Q. Okay. But when you were in the grand jury testimony, it
8 was your responsibility to be truthful?

9 A. Correct.

10 Q. And accurate?

11 A. Correct.

12 Q. And you wanted to be truthful and accurate, correct?

13 A. Absolutely.

14 Q. Sure. Okay. It's true that you interviewed many people
15 in this case?

16 A. Correct.

17 Q. Do you have any idea about the number?

18 A. In the P. Stones case?

19 Q. Yes.

20 A. Dozens.

21 Q. Dozens. You gained a lot of information?

22 A. Say again.

23 Q. You gained a lot of information?

24 A. Correct, some of it from law enforcement partners who
25 already had it, and some of it I developed through interviews

1 and through my partners.

2 Q. You conducted a lot of direct interviews?

3 A. I did.

4 Q. You conducted an interview of Ashley Jones, correct?

5 A. I'm sure I did.

6 Q. Okay. And you were aware of the fact that she assisted
7 Sirvonn Taylor in selling heroin, correct?

8 A. I'm sure I did.

9 Q. Would you like to see your grand jury testimony? I am not
10 sure if that was a request.

11 A. Yes.

12 Q. I am happy to show your grand jury testimony.

13 A. Thank you.

14 Q. What has already been marked as D. 3, Mr. Siegel, pull up
15 Bates number 00002068 for the witness. Do you see that page
16 there?

17 A. I do.

18 Q. Special agent, do you see the -- starting at line 11 if
19 you would like to refresh your recollection.

20 A. Okay.

21 Q. Okay. And it's true, special agent, that under oath you
22 testified that Ms. Jones helped Sirvonn Taylor selling heroin
23 mainly out of the Days Inn in Marshall Creek and sometimes out
24 of the Days Inn in Tannersville, correct?

25 A. Yes, in 2013.

1 Q. In 2013, correct?

2 A. Correct.

3 Q. She specifically did not say that she sold out of the
4 Howard Johnson, correct, according to your grand jury
5 testimony?

6 A. That's correct.

7 Q. And just as Mr. Brown -- similarly to Mr. Brown, I'm going
8 to ask you, do you know whether the Days Inn or the Days Inn in
9 Marshall Creek or the Days Inn in Tannersville has been
10 indicted by the government or sex trafficking or human
11 trafficking?

12 A. I don't believe they have, no.

13 Q. I'm sorry?

14 A. I don't believe they have, no.

15 Q. Similarly, do you know whether the government has
16 attempted to forfeit those Days Inn hotels?

17 A. I don't believe they have, no.

18 Q. And do you know what forfeiting a hotel means, when the
19 government tries to forfeit or seize a hotel?

20 MS. ROBERTS: Judge, I am going to object. This has
21 to do with penalty phase.

22 THE COURT: Yeah, I am going to sustain the -- let me
23 see counsel for a second.

24 (The following discussion occurred at sidebar:)

25 MS. ROBERTS: The government is going to object to

1 that line of questioning. Forfeiture is a determination after
2 the jury makes a determination as to guilt. It has to do with
3 penalties just like a fine or a --

4 MS. PAWELSKI: It's a count in the indictment, and
5 they've gone into --

6 THE COURT: Well, you have to include the forfeiture
7 count even though it's technically a penalty in the indictment.
8 So that in itself doesn't mean --

9 MS. PAWELSKI: Well, they have asked about sex
10 trafficking. They've asked about human trafficking. You have
11 allowed questions regarding whether or not those were indicted,
12 whether they were, and the forfeiture count is part of the
13 indictment which the government has brought in this case. She
14 is -- he is an F.B.I. agent who has worked on this case from
15 its inception. I don't understand how that's not relevant to
16 everything that has already been testified to.

17 THE COURT: The objection is sustained. As to
18 speaking of sex trafficking or drug trafficking, they are
19 criminal charges, not the penalties. They are the criminal
20 charges. The way we bifurcate a criminal case when it relates
21 to forfeiture that once the jury has made a determination of
22 that -- of guilt or innocence, then and only then on the
23 underlying charges will the forfeiture phase come up.

24 And you can argue whatever you want at that point or
25 call witnesses if necessary at the forfeiture stage related to

1 forfeiture, not now. No. 2, as I understand the first witness
2 in any case is the one that takes the longest even if they have
3 the least information to say, that they are almost irrelevant
4 to the case, and yet it's taken a tremendous amount of time.
5 Please do not say -- ask questions that have been asked by
6 co-counsel, like, let -- I know Mr. Brown already asked you
7 this, but let me ask you, blah, blah, blah, don't do that
8 unless -- unless the specific question relates directly to your
9 client. And as to forfeiture, that's my ruling. Forfeiture
10 occurs if and only if the jury decides that your clients are
11 guilty. Then there be a forfeiture proceeding afterwards.
12 It's a penalty. It's not part of the original charge, okay.
13 Let's keep going.

14 (The discussion at sidebar concluded.)

15 BY MS. PAWELSKI:

16 Q. Going back to the same page we were on, 2068, regarding
17 the Days Inn, no one -- the Days Inn itself was not indicted
18 for drug trafficking to the best of your knowledge, correct?

19 A. No.

20 Q. Thank you. Special agent, you became aware of the fact
21 that meetings were held by the P. Stones on a monthly basis
22 during the course of your investigation?

23 A. Correct.

24 Q. And it was approximately two meetings every month?

25 A. Sounds right.

1 Q. And those meetings occurred at the Super 8 or the Budget
2 Inn was your testimony, correct?

3 A. I believe, yes.

4 Q. Okay. And to the best of your knowledge, has the Super 8
5 or the Budget Inn been indicted?

6 A. No.

7 Q. No. And if it was a monthly or bimonthly meeting, did you
8 gain any information as to the number of gang members that
9 would be showing up at either the Super 8 or the Budget Inn?

10 A. Did I gain knowledge of that?

11 Q. Yes, did you find out? Was it a large number?

12 A. I don't know the number.

13 Q. It was a meeting for the gang, correct?

14 A. Right.

15 Q. Is it safe to assume a large number of gang members showed
16 up for these meetings?

17 A. That's a safe assumption.

18 Q. I want to ask you one other thing. In the course of your
19 investigation, you testified about a technique that you used
20 involving a Jose Velazquez. Do you remember Mr. Velazquez?

21 A. I do.

22 Q. Do you recall that you testified about an investigative
23 technique whereby you searched his phone and it showed all of
24 the places that he had been according to his Wi-Fi connections
25 at different hotels?

1 A. I recall testifying to that, yes.

2 Q. Okay. You remember that investigative technique?

3 A. Cell phone download.

4 Q. Yes. That's still a technique that's employed today?

5 A. Yes.

6 Q. Do you know, sir, whether that was employed in this case?

7 A. It was, yes.

8 Q. It was employed in this case?

9 A. Yes.

10 Q. As to who -- as to whose phones?

11 A. I mean, I believe a lot of phones were seized in this
12 investigation.

13 Q. You just don't know that --

14 A. I don't know how many. Standard practice would be to
15 obtain a search warrant or a consent for any phone we collect
16 because obviously these days or even back in 2014 and '15 a
17 phone contains an immense amount of data.

18 Q. Therefore, the government should be in possession of all
19 those downloaded phones, the information they gathered from all
20 those downloaded phones?

21 A. If they were downloaded -- I recall some phones back in
22 2014 or '15 may not have been supported by the technology back
23 then so --

24 Q. How about later on?

25 A. You mean today?

1 Q. Sure. I mean, in this investigation that we're talking
2 about that you're here to testify about.

3 A. It depends. Back then there were a lot of different
4 brands and models of phones. So whether or not every single
5 phone, every single software feature -- back then there was a
6 plethora of flip phones, which you don't see anymore these
7 days. So I just don't recall if some of the phones recovered--
8 some of the phones -- I believe one of Jose Velazquez's phones
9 was from years prior to our investigation. It was just in
10 evidence in Stroud Area. There may have been an issue
11 conducting a download based upon the technology available at
12 that time.

13 Q. Okay, fair enough. I understood you testified that your
14 investigation primarily covered the gang members and not the
15 locations, correct, of --

16 A. Focus, yes.

17 Q. The focus.

18 A. A byproduct of that focus was some hotels in our
19 investigation.

20 Q. And but you did gain knowledge of hotels that were being
21 used by the P. Stones?

22 A. Through the course of the investigation.

23 Q. Through the course of the investigation and through your
24 interviews?

25 A. Correct.

1 Q. You testified in the grand jury for I close to 139 pages.
2 Do you remember how long you were in there?

3 A. All morning.

4 Q. All morning. You remember that. And, special agent, it's
5 true, is it not, that during the course of that entire grand
6 jury testimony you were never asked one question -- not one
7 question about Nazim Hassam?

8 A. That's correct.

9 MS. PAWELSKI: May I have a moment just to confer,
10 Your Honor?

11 THE COURT: Sure.

12 MS. PAWELSKI: Thank you. That's all I have. Thank
13 you, special agent.

14 THE COURT: Thank you, Ms. Pawelski. Redirect?

15 MS. ROBERTS: Thank you, Your Honor.

16 REDIRECT EXAMINATION

17 BY MS. ROBERTS:

18 Q. During the course of your investigation, did it uncover
19 evidence that the Super 8 motel or any of its employees or
20 agents were conspiring with drug dealers and drug traffickers?

21 A. I don't believe so, no.

22 Q. During the course of your investigation, did it reveal
23 evidence that anyone at any other hotels that were mentioned
24 such as the Budget Inn were conspiring with drug dealers and
25 drug traffickers?

1 A. I don't believe so, no.

2 Q. And who was the leader of the P. Stones?

3 A. Sirvonn Taylor.

4 Q. What happened to the P. Stone gang when Sirvonn Taylor was
5 arrested?

6 A. It essentially was dismantled.

7 Q. Was that the goal of the investigation?

8 A. It was to stop the human trafficking of the women and to
9 dismantle the organization in its entirety.

10 Q. When you say it was dismantled, what do you mean by that?

11 A. Leadership indicted, actions stopped, violence stopped,
12 targeting them through the Safe Streets Task Force with federal
13 law enforcement, with state and with local law enforcement, and
14 the appropriate charging mechanisms, whether it is the D.A.'s
15 office, state or attorney general or state or federal
16 government.

17 Q. Did the members or individuals who were members of the P.
18 Stones go their separate ways out of the gang?

19 A. A significant number of them -- significant number of them
20 were indicted though during my time in the investigation. Some
21 of those members who were not indicted were subsequently
22 indicted, moved to other areas or were charged and arrested
23 through the state or local mechanisms.

24 Q. You were asked on cross examination by attorney Brown
25 regarding Sheryl Patishnock leaving the P. Stones. Do you

1 recall what Sirvonn Taylor did when Sheryl Patishnock mentioned
2 that she wanted to leave the P. Stones gang voluntarily?

3 A. From my recollection, I believe ordered an assault on her
4 or attack on her. And then I have the benefit of having read a
5 page of a grand jury testimony, so I can -- I can respond to
6 that based on that recollection. When he directed that other
7 women in the gang assault her because she had paid the dues of
8 those girls to Sirvonn, they were all hesitant or reluctant to
9 assault her because they appreciated the gesture she had done
10 on behalf of them. But the threat was still there, and
11 ultimately I believe it was Salena Bayer- Davis agreed to
12 assault Sheryl Patishnock and commence to a slap or punch her.

13 Q. One final question with regard to -- I know we talked
14 about the Super 8 and Budget Inn. What about with regard to
15 the Days Inn? Did your investigation reveal any type of
16 evidence any employees or agents associated with the Days Inn
17 who were conspiring with drug dealers and human traffickers?

18 A. Not that I can recall.

19 MS. ROBERTS: Nothing further, Your Honor.

20 THE COURT: You may step down.

21 THE WITNESS: Thank you. Thank you.

22 THE COURT: Next witness. Ms. Roberts, is the next
23 witness yours or Mr. Camoni's?

24 MS. ROBERTS: Mr. Camoni.

25 SIRVONN TAYLOR, called as a witness, being duly

1 sworn, testified as follows:

2 DIRECT EXAMINATION

3 BY MR. CAMONI:

4 Q. Mr. Taylor, are you known by any nicknames or street
5 names?

6 A. Yes.

7 Q. What names?

8 A. Black.

9 Q. Is that the only one?

10 A. Amir or P. Black, Prince Black.

11 Q. What did you go by mostly?

12 A. Black Stone also, but Black basically.

13 Q. How old are you today?

14 A. I'm 37.

15 Q. How far did you go in school?

16 A. I got my G. E. D.

17 Q. Where do you currently reside?

18 A. Right now in jail.

19 Q. Which jail?

20 A. I'm at Lackawanna right now.

21 Q. Are you in prison? You're in Lackawanna because you're
22 testifying here, correct?

23 A. Correct.

24 Q. Are you in prison in general because you're serving a
25 sentence?

1 A. Yes.

2 Q. And, in fact, right now you're serving two sentences,
3 correct?

4 A. Yes.

5 Q. Let's start -- were you prosecuted by the U. S. Attorney's
6 Office?

7 A. Yes.

8 Q. What were you convicted of?

9 A. Conspiracy to sex trafficking and conspiracy to traffic in
10 heroin, distribution of heroin.

11 Q. All right. Was that a conspiracy to traffic over a
12 kilogram of heroin?

13 A. Yes, one to three kilos.

14 Q. Between one and three kilos?

15 A. Yes.

16 Q. The sex trafficking conspiracy, was that conspiracy to sex
17 traffic by force or coercion?

18 A. Yes, force, fraud or coercion.

19 Q. All right. Were you dealing any other types of drugs
20 other than heroin?

21 A. Early on, but heroin was my main drug.

22 Q. Were you dealing heroin with other people?

23 A. Yes.

24 Q. Were you prosecuted with any of those other people?

25 A. Yes.

1 Q. Can you name some of the people you were prosecuted with?

2 A. Jose Velazquez, Jamiell Sims -- I know their nicknames --
3 Sean Griffin, Arthur Taylor.

4 Q. Arthur Taylor is your cousin?

5 A. Yes.

6 Q. What about Salena Bayer-Davis?

7 A. Her, too.

8 Q. Did you plead guilty to those drug and sex trafficking
9 charges you mentioned?

10 A. Yes.

11 Q. Have you been sentenced for those crimes yet?

12 A. Yes.

13 Q. What were you sentenced to?

14 A. 240 months.

15 Q. Were you also sentenced to a term of supervised release
16 after you served your prison sentence?

17 A. Yes.

18 Q. How long was that term?

19 A. Eight years.

20 Q. And when you pleaded guilty, did you enter that plea
21 because you entered a plea agreement with the United States?

22 A. Yes.

23 Q. I would like to bring up exhibit 16.

24 THE COURT: Is there going to be any objection to 16
25 coming in?

1 MR. BROWN: Not from Mr. Bhimani, Your Honor.

2 MS. PAWELSKI: No.

3 THE COURT: So we will display it.

4 MR. CAMONI: Thank you, Your Honor.

5 BY MR. CAMONI:

6 Q. What do we see on the screen, Mr. Taylor?

7 A. My plea agreement.

8 Q. What are we looking at on the screen here?

9 A. My plea agreement.

10 Q. Is that a fair and accurate plea agreement you entered
11 into with the government?

12 A. Yes.

13 Q. I would like to go to page 26, please. Do you recognize
14 the signature at the top of that page?

15 A. Yes.

16 Q. Whose signature is that?

17 A. That's my signature.

18 Q. It's a little bit faint. When did you sign the plea
19 agreement?

20 A. 11/09/2015.

21 Q. Whose signature is that below yours?

22 A. My lawyer.

23 Q. Was that person your lawyer through the criminal case
24 where you entered your guilty plea?

25 A. Yes.

1 Q. She was your lawyer the whole time?

2 A. No, I had two different lawyers after her.

3 Q. But you had lawyers the entire time?

4 A. Yes.

5 Q. All right.

6 MR. CAMONI: Your Honor, at this time I would like to
7 move to admit Government's Exhibit 16.

8 MR. BROWN: No objection.

9 MS. PAWELSKI: No objection.

10 THE COURT: It's admitted.

11 BY MR. CAMONI:

12 Q. Back to page one -- and bring up paragraph one, please.
13 So what charges did you agree to plead guilty to in this
14 agreement. This is the first?

15 A. Count one, I believe that was the drug charge, the
16 distribution of heroin, one to three kilos.

17 Q. If we can move down to page two, first page at the top.
18 What was the second count you pled guilty to?

19 A. Count two was the sex trafficking.

20 Q. That was a sex trafficking conspiracy, correct?

21 A. That's conspiracy to commit sex trafficking by threat,
22 force or coercion.

23 Q. These charges, they are felonies, correct?

24 A. Yes.

25 Q. Can we bring up page nine, please? As part of this

1 agreement in paragraph 13, did the government reserve its right
2 to recommend up to the maximum sentence for you?

3 A. Yes.

4 Q. Do you remember what the maximum sentences were, sir?

5 A. Life.

6 Q. All right. As part of this agreement -- you can take that
7 down. Did you also enter into a cooperation agreement with the
8 government?

9 A. Yes.

10 Q. Can we bring up Exhibit No. 17, please? Do you recognize
11 this document?

12 A. Yes.

13 Q. What is this?

14 A. This my cooperation agreement that I cooperate with all
15 federal, state and local enforcement, government basically.

16 Q. As part of this agreement, you agreed to cooperate with
17 whatever investigation the government asked you to?

18 A. Yes.

19 Q. All right. Can we go to page six, please? And again,
20 whose signature is at the top there?

21 A. That's my signature.

22 Q. Did you sign this document the same day as the other part
23 of your agreement?

24 A. Yes.

25 Q. And again, is that your attorney's signature below yours?

1 A. Yes.

2 Q. Now, what did you agree to -- you mentioned cooperate with
3 investigations. But what did you agree to in this agreement?

4 A. In this agreement basically tell full -- fully truthful
5 testimony in any trial the government may need me in or
6 anything that I may be of use in.

7 Q. All right. So did you agree to be interviewed?

8 A. Yes.

9 Q. And you agreed if called to testify?

10 A. Yes.

11 Q. And is it a part of this agreement -- go back to page one,
12 please. That it's a material condition of this agreement that
13 the cooperation is complete and truthful. Is that what's in
14 the agreement?

15 A. Yes.

16 Q. And do you understand no part of this agreement gives you
17 any protection if you lie under oath or commit perjury?

18 A. Yes.

19 Q. Now, in preparation for your testimony today, did you meet
20 with attorneys for the government?

21 A. Yes, I have.

22 Q. And did the attorneys for the government tell you what to
23 testify to?

24 A. No.

25 Q. What did the attorneys for the government tell you?

1 A. To tell the truth by any means and don't lie and just
2 basically tell the truth.

3 Q. So why did you agree to cooperate in this your federal
4 case?

5 A. In my federal case I agreed to cooperate because
6 basically, like, because I was a gang leader at the time and I
7 just wanted to do right. I wanted to get out, distance myself
8 from the gang basically and have a chance at a normal life with
9 my children.

10 Q. You were also looking for a break in your sentence, fair?

11 A. Yes, that, too.

12 Q. You're hoping by cooperating you get out of jail sooner
13 than you would if you didn't cooperate?

14 A. Yes.

15 Q. Has anyone made you any promises that that's definitely
16 going to happen?

17 A. No.

18 Q. And you understand based on what we just discussed in that
19 cooperation agreement if you lie during your testimony that
20 that definitely will not happen?

21 A. Yes.

22 Q. All right. Are the felony charges that you pled guilty to
23 in this case the only felony convictions that you have on your
24 record?

25 A. No.

1 Q. All right. In 2004 were you convicted of felony
2 possession of a controlled substance crack or cocaine base?

3 A. Yes.

4 Q. In 2005 were you convicted of a firearm carried without a
5 license and receiving stolen property?

6 A. Yes.

7 Q. In 2007, were you convicted of assault?

8 A. Yes.

9 Q. In 2014, were you convicted of criminal solicitation to
10 commit homicide in the third degree?

11 A. Yes.

12 Q. Now, was that a Pennsylvania state case?

13 A. Yes.

14 Q. Have you been sentenced on that?

15 A. Yes.

16 Q. And you're currently serving that sentence; is that
17 correct?

18 A. Yes.

19 Q. Does your plea agreement with the United States Attorney's
20 Office have anything to do with your state case?

21 A. No.

22 Q. You mentioned that you were a gang leader.

23 A. Yes.

24 Q. At the time that you were arrested, is that what you
25 meant?

1 A. Yes.

2 Q. What gang was that?

3 A. The Black P. Stones.

4 Q. What was your highest rank in that gang?

5 A. I was a prince. I was basically the leader of the gang.

6 Q. And what area were you the leader of? What was your
7 territory?

8 A. In Pennsylvania, New Jersey, New York and Maine.

9 Q. And so your rank was called prince?

10 A. Yes.

11 Q. Were there people that were ranked under you?

12 A. Yes.

13 Q. What was the rank directly under you?

14 A. O. G.s.

15 Q. O. G. What does that stand for?

16 A. Original gangster.

17 Q. Were there any O. G.s that worked with you in the
18 Stroudsburg area?

19 A. Yes.

20 Q. Who are the O. G.s there?

21 A. You had Arthur Taylor, my cousin, and Xavier Petty.

22 Q. What was Xavier Petty's street name?

23 A. X.

24 Q. When did you become a prince in the P. Stones?

25 A. In 2001, around 2001.

1 Q. You were a prince in the P. Stones for a while?

2 A. Yes.

3 Q. Did you always lead a Pennsylvania set of the P. Stones?

4 A. Yes.

5 Q. So where in Pennsylvania was this -- the group you led?

6 A. East Stroudsburg, Stroudsburg and Mount Pocono.

7 Q. You said though as a prince you covered a wide territory
8 in numerous states, correct?

9 A. Yes.

10 Q. Were you always physically located in East Stroudsburg and
11 that area?

12 A. Physically, yeah, I come, but I wouldn't be -- I wouldn't
13 stay there. I go to different states.

14 Q. Was there a time when you started spending more time
15 there?

16 A. Yeah.

17 Q. When was that?

18 A. Around 2011-ish, '11.

19 Q. When were you arrested? When did it end?

20 A. 2014.

21 Q. So between 2011 and 2014, was that the time that you spent
22 the most time in that Stroudsburg area?

23 A. Yes.

24 Q. Are the Black P. Stones affiliated with any other gang?

25 A. Yeah, Bloods.

1 Q. So how does that affiliation work?

2 A. It's, like, the Black P. Stones came before the Bloods,
3 but you have a Black P. Stone named T. Rogers that went to L.
4 A. and formed the Bloods. So it's like -- it's kind of like an
5 alliance basically.

6 Q. So they are ally gangs?

7 A. Yes.

8 Q. So you mentioned Arty Taylor?

9 A. Yes.

10 Q. You mentioned Jose Velazquez?

11 A. Yes.

12 Q. Can we bring up what's been previously admitted as exhibit
13 98? Who are we looking at here?

14 A. Sev, which is Jose Velazquez, and Arthur Taylor.

15 Q. Is Arthur the one in the green or the blue shirt?

16 A. The green.

17 Q. What was Arthur Taylor's rank?

18 A. O. G.

19 Q. What was -- did Sev have a rank?

20 A. Yes.

21 Q. What was his rank?

22 A. A five star general.

23 Q. Five star general?

24 A. That's right beneath O. G. basically.

25 Q. He was also an O. G. or five star general the same?

1 A. No, it's O. G., and then you got the five star.

2 Q. So he was right below where Arty Taylor was?

3 A. Yes.

4 Q. Did Sev have any other roles in the gang?

5 A. Yes.

6 Q. What was his role?

7 A. Sev was a pimp. He had Seven Squad, which was basically a
8 set, like, where the females would be prostitutes basically.

9 Q. So Seven Squad was the group that handled --

10 A. The prostitution.

11 Q. Prostitution. Was that all of the prostitution the P.
12 Stones did, or was he just the main force?

13 A. He was the main force.

14 Q. All right. Let's bring up No. 13, please. Who is that?

15 A. That's Salena.

16 Q. Did she have a street name?

17 A. Yeah, vicious.

18 Q. What was Salena's role in the gang?

19 A. Salena was also like a pimp but they call madams, too.
20 And also, like, she was kind of, like, an enforcer.

21 Q. What does an enforcer do?

22 A. She basically violate the females if they violate.

23 Q. So can you explain to the jury what do you mean? What
24 does violate mean?

25 A. If they do something wrong where it's -- let's say we have

1 a set of rules, and you violate a rule, then you get violated.

2 And sometime that means the violation could be physical.

3 Q. What do you mean by physical?

4 A. You get beat up basically.

5 Q. By how many people?

6 A. Females three, and the guys five.

7 Q. So who was in charge of violating the males?

8 A. I was basically.

9 Q. So if someone violated, you would order an assault?

10 A. Yes.

11 Q. And who would actually carry out that assault?

12 A. Different men, different P. Stone members. It depends who
13 was being violated.

14 Q. Did you pick?

15 A. Yeah, I picked.

16 Q. If the women that were being violated, was it Salena that
17 picked?

18 A. Yes, and Salena nine out of then times was in it.

19 Q. I'm sorry?

20 A. Salena nine out of ten times was involved in the beatings,
21 too, not ten she would be involved.

22 Q. I understand. So can we bring up No. 12, please? Who is
23 this?

24 A. That's Sheryl.

25 Q. Sheryl who?

1 A. Sheryl Patishnock. We called her Scarlet.

2 Q. You understand -- you remembered her last name as
3 Patishnock. What was her role in the gang?

4 A. At one time she was the first lady.

5 Q. What's that?

6 A. That's, like, what I am. Like, when I was the prince, you
7 have somebody, like, that control the females, and that was
8 her.

9 Q. So she would have been in control of the females for some
10 period of time?

11 A. Yes.

12 Q. Was there another first lady during the time we're talking
13 about?

14 A. Angel.

15 Q. Can we bring up 15, please? This one has not been
16 admitted yet. Who was this?

17 A. That's Angel Jordan Capone.

18 Q. Is that a fair and accurate depiction of the person you
19 know as Jordan Capone?

20 A. Yes.

21 MR. CAMONI: Your Honor, move to admit 15.

22 THE COURT: Any objection?

23 MR. BROWN: No objection.

24 MS. PAWELSKI: No.

25 THE COURT: It's admitted.

1 BY MR. CAMONI:

2 Q. What was her role as first lady?

3 A. Her role basically was the same thing. Like, she would
4 control the females, make sure that everything is going right
5 within the gang as in with the females and make sure that they
6 wouldn't violate any rules.

7 Q. All right. How about -- can we bring up 14? What's been
8 previously identified as Government's Exhibit 14, do you
9 recognize this person?

10 A. That look like Millie.

11 Q. Do you know her full name?

12 A. No.

13 Q. Did you have any nicknames for her?

14 A. Millie.

15 Q. Millie. What was her role in the gang?

16 A. She was -- she wasn't really involved in the gang, but she
17 was with Arty, and she was being prostituted by Arty, by
18 Arthur.

19 Q. She was not a member of the gang?

20 A. Huh-uh.

21 Q. But Arty was her pimp?

22 A. Yes.

23 Q. Okay.

24 MR. CAMONI: Your Honor, move to admit No. 14.

25 MR. BROWN: No objection.

1 BY MR. CAMONI:

2 Q. Can we bring up what was been previously admitted as
3 Government's Exhibit 18? Do you recognize this person?

4 A. Yes.

5 Q. Who is that?

6 A. Kenya.

7 Q. Kenya what?

8 A. Evans.

9 Q. Who is Kenya Evans?

10 A. Kenya Evans was a prostitute.

11 Q. Was she a member of the gang?

12 A. Seven Squad, yeah.

13 Q. So that means she was also a P. Stone?

14 A. Yes.

15 Q. What was your relationship with Kenya Evans?

16 A. Me and Kenya had a romantic relationship at one point in
17 time.

18 Q. Any other relationships?

19 A. Yeah, and at one point in time I also -- me and Ricquell
20 Lindo prostituted her.

21 Q. So you were her pimp?

22 A. Yes.

23 Q. So the P. Stones have male and female members?

24 A. Yes.

25 Q. Take that down. How did male members become a member of

1 the gang?

2 A. Fight. You fight for 21 seconds five people for 21
3 seconds.

4 Q. So a man who wants to be become a member of the gang had
5 to fight five members of the gang?

6 A. Yes.

7 Q. How did the women become members of the gang?

8 MS. PAWELSKI: I will object on relevance at this
9 point.

10 THE COURT: The objection is overruled.

11 THE WITNESS: Some women got sexed in, and some women
12 fought.

13 BY MR. CAMONI:

14 Q. So let's start with the fighting. Was it the same rules?

15 A. Yes, 21 seconds, but it was three females instead of five.

16 Q. What does it mean to be sexed in?

17 A. You have sex with five gang members.

18 Q. All right. Who -- where did the women who joined the gang
19 come from? How did you find them? How did they find you?

20 A. They would just be around, like, we would all be around
21 each other maybe probably in the parks, gatherings, things of
22 that nature.

23 Q. You get to know them?

24 A. Yeah.

25 Q. How did you decide who to invite to join the gang?

1 A. It was who was closest to us basically, who we trusted the
2 most, you know, who we felt like was family.

3 Q. Do you know how old these girls were when they joined the
4 gang?

5 A. Some of them, yes.

6 Q. Some of them?

7 A. Yes.

8 Q. Who did you know?

9 A. I knew Jordan Capone age.

10 Q. How old was she?

11 A. Jordan was 15.

12 Q. How did she join the gang?

13 A. She fought.

14 Q. Fought into the gang at 15?

15 A. Yes.

16 Q. Any others you knew the age?

17 A. Who else? Stephanie.

18 Q. Who was Stephanie?

19 A. Hazel.

20 Q. How did she come to the gang?

21 A. Hazel got sexed in.

22 Q. How old was she?

23 A. 16.

24 Q. All right. So as leader of the gang, was part -- let me
25 back up. Was part of the gang's operations to make money?

1 A. Yes.

2 Q. All right. So as leader of the gang, were you in charge
3 of any of that operation?

4 A. Yes.

5 Q. What were you in charge of?

6 A. Drugs.

7 Q. You said it was heroin mostly, right?

8 A. Yeah.

9 Q. Any other drugs that were involved?

10 A. In the beginning we was -- first we started off with crack
11 and then coke and then moved up to perc's and heroin.

12 Q. All right. Tell the jury -- let's focus us on between
13 2011 and your arrest in 2015.

14 A. '14.

15 Q. '14. How did the drug business work?

16 A. Basically what I do is get drugs from New York. I'm not
17 going to use the word cop -- but purchase drugs from New York,
18 and basically what I do is I come out of town to Pennsylvania
19 first. I will head to the East Stroudsburg area, and I come
20 out here, get rooms at the hotel. What I do is I distribute
21 drugs to the drug dealers, some of them being P. Stones, some
22 of them not. Afterwards what I do is I go to Maine and
23 distribute the rest of the drugs in Maine.

24 Q. In the State of Maine?

25 A. Yes.

1 Q. Were there other members involved in the drug trafficking?

2 A. Yes.

3 Q. Now, you pleaded guilty to sex trafficking, too, you said?

4 A. Yes, conspiracy to sex trafficking, yes.

5 Q. How did that start with the P. Stones?

6 A. That started with Sheryl because Sheryl was prostituting
7 in New York, and I came home from upstate 2008, and I seen
8 Sheryl, and she left her pimp. When she left her pimp, she
9 came back up to the Poconos area, and she started prostituting
10 for herself at the time. And then afterwards that's how
11 basically the prostitution got started in the P. Stones.

12 Q. So she got to know the P. Stones at a time while she was
13 prostituting independently?

14 A. Yes.

15 Q. And did the P. Stones and you as leader see that as a way
16 for the gang to make money?

17 A. Yes.

18 Q. You mentioned Sev and Seven Squad was in charge of that?

19 A. Yes.

20 Q. How did that work?

21 A. That happened -- it worked because her and Sev wound up
22 getting together, like, romantically, and she basically --
23 like, Sev seen the money. I seen the money with them pimping.
24 We established that basically Sev should take over since he's
25 around her most of time, he's around the females, he knows the

1 business now, he now how to do the Back Page thing and so forth
2 and so on.

3 Q. You mentioned Back Page. What's that?

4 A. Back Page is a website you go on, and you could post the
5 females, like, specials and things of that nature, how many
6 females you have prostituting for you and how much you pay per
7 hour, for the half hour.

8 Q. So advertising essentially?

9 A. Yes.

10 Q. Right. Who placed those ads for the P. Stones?

11 A. Sheryl or Sev did, but Sheryl nine out of then -- Scarlet
12 -- because she knew how to do it.

13 Q. Who paid for those ads?

14 A. Sometime me, sometimes Sheryl, sometimes Sev.

15 Q. Who was Sev directly responsible for? Whose pimp was he?

16 A. He was Kenya's. He was Baby's, and he was Scarlet.

17 Q. Who is Baby?

18 A. Baby -- Abigail -- I forget her last name.

19 Q. What was Baby from?

20 A. Baby was from -- she was from Baltimore.

21 Q. How old was Baby?

22 A. Baby was at the time -- we thought she was 18, but Baby
23 was 15, 16 years old.

24 Q. And you mentioned Arty was a pimp, too?

25 A. Yes.

1 Q. Who did Arty pimp?

2 A. Millie.

3 Q. And can we bring up what's been previously marked as
4 Government's Exhibit 99? Do you recognize that person?

5 A. Yes.

6 Q. Who is that?

7 A. That's Buck. William Battle.

8 Q. Was he a P. Stone?

9 A. Yes.

10 Q. What was role in the gang?

11 A. He was a pimp more or less not doing it like Sev but
12 independently.

13 Q. He was a member of the gang, but his pimping was on his
14 own?

15 A. Yes.

16 Q. Do you know how many girls he was pimping?

17 A. Two.

18 MR. CAMONI: Move to admit Government's Exhibit 99.

19 THE COURT: Any objection?

20 MR. BROWN: No.

21 MS. PAWELSKI: No.

22 THE COURT: Admitted.

23 BY MR. CAMONI:

24 Q. I would like to bring up Government's Exhibit 100. Do you
25 recognize this person?

1 A. Yes.

2 Q. Who is that?

3 A. Derrel.

4 Q. Derrel. Do you know his last name?

5 A. Wilson I believe.

6 Q. Did he have a street name?

7 A. Big.

8 Q. Big?

9 A. Yes.

10 Q. What was his role?

11 A. Big was a pimp.

12 Q. Was he a P. Stone?

13 A. Yes.

14 Q. Where was he from?

15 A. New York.

16 Q. Ever bring him to the Poconos?

17 A. Yeah, I brought him up the Poconos.

18 Q. Why did you bring him to the Poconos?

19 A. Because at the time -- see, all right. Can I explain the
20 whole thing? All right.

21 Q. Explain to the jury.

22 A. In Black P. Stone it's different hoods. So how it is my
23 hood, which was my gang, which was my set was G. B. S., and I
24 gave out another set under my set to him, which was G. S. R.,
25 and that's how basically when the pimping got involved, I

1 brought him up to the Poconos basically because he had girls --
2 he had three girls -- and also to basically show everybody else
3 how to pimp and things of that nature.

4 Q. You brought him in because you thought he knew the
5 business better than the people that you had around you?

6 A. Yes.

7 Q. You brought him in to train your squad on how to --

8 A. Yes.

9 Q. Did he teach you how to run the business better?

10 A. Yes.

11 Q. What kind of stuff did he teach you?

12 A. The fact of like difference between a gorilla pimp and
13 Romeo pimp, things of that nature.

14 Q. What's a Romeo pimp?

15 MS. PAWLESKI: Objection.

16 THE COURT: The objections are overruled. This is a
17 sex trafficking and drug trafficking case. Background how it
18 occurred is relevant to the case. It's overruled. Go ahead.

19 BY MR. CAMONI:

20 Q. What's a Romeo pimp?

21 A. A Romeo pimp is basically a pimp that doesn't put his
22 hands on female and a pimp that basically talks to her sweet
23 like -- like, romancing basically, romancing her to get her to
24 do what he her wants to do by basically romancing her.

25 Q. Does he mean it?

1 A. No, he don't mean it. He tell her what she wants to hear.

2 Q. What's a gorilla pimp?

3 A. A pimp that does it by force, which is basically if you
4 don't do this, I'm going to put my hands on you.

5 Q. Any gorilla pimps in the P. Stones?

6 A. Yes.

7 Q. Who were the gorilla pimps?

8 A. Sev and Salena.

9 Q. What kind of pimp were you?

10 A. I was a Romeo, but it was one time where me and -- me and
11 Kenya had a situation romantically because she was a prostitute
12 for Sev at the time, and that's the time where now she has sex
13 with Sev, and we had a thing where me and her agreed that we
14 wouldn't have sex with other people that we knew basically. So
15 when I found out, I put my hands on her that one time when we
16 was in the Howard Johnson.

17 Q. We will come back to that.

18 A. All right.

19 Q. How were the girls who -- you can take that one down.

20 Thank you. How were the girls pimped by the P. Stones get
21 paid?

22 A. Drugs.

23 Q. Money?

24 A. No.

25 Q. What did they get?

1 A. Drugs.

2 Q. What kind of drugs?

3 A. Heroin.

4 Q. Where did the P. Stones who paid their girls in drugs get
5 the heroin?

6 A. From me.

7 Q. So what was the purpose of giving the girls drugs?

8 A. Basically to keep them under your control.

9 Q. How -- why would giving them drugs keep them under
10 control?

11 A. Because heroin -- heroin is a -- is a real, real bad drug.
12 And once you're on it, your body craves it. So first it
13 started off with per's -- some of the girls using perc's first.
14 And perc's is like heroin, but it's more expensive. So what
15 Sev would do if she was using perc's, he get her hooked on
16 dope. He will give her heroin because perc's is more
17 expensive. Perc's is \$30 when you get heroin for \$10 a bag.
18 He give her heroin, so now the fact her body needs the heroin
19 and if she don't do -- if she don't make no calls or make no
20 money, she won't get the heroin.

21 Q. Sev and the other pimps in the P. Stones would tell them,
22 they don't work, they are not getting their heroin?

23 A. Yes.

24 Q. Kenya Evans, was she on drugs?

25 A. Yes, she was on heroin.

1 Q. Did you give her heroin to keep her working?

2 A. Yes.

3 THE COURT: Let me ask you, I assume you're going to
4 be here for a little bit yet.

5 MR. CAMONI: Yes, Your Honor.

6 THE COURT: It's 3:00. We will take the break so
7 everyone can use the facilities. It's been two hours. So we
8 will take 15 minutes, and then we will come back and continue.
9 Now, no conversations or discussions among yourselves or with
10 anybody else. Don't form any opinions. You haven't heard all
11 of the evidence in the case. No research of any kind related
12 to anything on the case. No reading or listening to anything
13 about the case. If anyone were to talk to you about the case,
14 you must advise us of that immediately. All right. See you in
15 15 minutes.

16 (A jury recess was taken.)

17 THE COURT: For defense exhibits, the rules require
18 you to give me an exhibit sheet. I would like to make sure I
19 note uses of an exhibit. So if you would by tomorrow give me
20 our form that's in the local rules -- an exhibit form so I can
21 make sure I keep track of what you use when you're speaking to
22 a witness.

23 MR. BROWN: Will do, Your Honor.

24 THE COURT: All right . And then, Mr. Camoni, you
25 didn't move to admit the plea agreement addendum 17. Did you

1 intend to move that?

2 MR. CAMONI: I will move to admit it, Your Honor. I
3 think I will ask to move it -- admit it under seal because it's
4 filed under seal in Mr. Taylor's case.

5 THE COURT: I am the one who sealed it, right?

6 MR. CAMONI: I believe so, Your Honor.

7 THE COURT: But sealed in terms of the rest of the
8 world. Counsel obviously I am sure will have questions on
9 that. We need to make sure it's available.

10 MR. CAMONI: Understood.

11 THE COURT: I assume you have no objection to the
12 addendum to the plea agreement being admitted?

13 MR. BROWN: No, Your Honor.

14 MS. PAWELSKI: No, Your Honor.

15 MR. CAMONI: I think I neglected to move in 100,
16 which is a photograph as well. I was going to do that when we
17 come back. It's up to you if you want to handle that now.

18 THE COURT: 100?

19 MR. CAMONI: 100.

20 THE COURT: Mr. Wilson?

21 MR. CAMONI: Yes.

22 THE COURT: Any objection?

23 MR. BROWN: No objection.

24 MS. PAWELSKI: Your Honor, I have no objection to
25 that. I would like to put respectfully a continuing objection

1 on the record going forward to this conduct until and unless it
2 is tied to the Howard Johnson because I have an obligation to
3 my client to do so respectfully.

4 THE COURT: Oh, that's no problem. Your objection is
5 noted. As I said, this is a sex trafficking and drug case that
6 involves a background that brings us to those locations. All
7 of this is particularly relevant in my mind and also
8 appropriate in the case. Your objection will be noted as
9 continuing to evidence, I guess, of -- does that mean you won't
10 be cross-examining anybody on the P. Stones of their
11 activities?

12 MS. PAWELSKI: Depending -- that does not mean that.
13 Until it's tied to this, I just note a continuing objection.

14 THE COURT: All right.

15 MS. PAWELSKI: On relevance.

16 THE COURT: Okay. We will take a break for 15
17 minutes.

18 (A brief recess was taken.)

19 THE COURT: Welcome back. Okay. You may continue.

20 MR. CAMONI: Thank you, Your Honor.

21 BY MR. CAMONI:

22 Q. Mr. Taylor, we were talking about the sex trafficking
23 business the P. Stones were conducting?

24 A. Yes.

25 Q. Where did you and the other P. Stones conduct the sex

1 trafficking business?

2 A. In East Stroudsburg. Are you talking about hotels?

3 Q. You went to hotels?

4 A. Yes.

5 Q. What hotels did you use?

6 A. We used the Howard Johnson, the Quality Inn, the Econo
7 Lodge, the Days Inn.

8 Q. Did you use something called a Comfort Inn?

9 A. Yes.

10 Q. Hampton Inn?

11 A. Yes.

12 Q. Several different hotels you used?

13 A. Yes.

14 Q. Over the course of several years we are talking about?

15 A. Yes.

16 Q. So specifically between 2011 and 2014, did the P. Stones
17 spend any more time doing sex trafficking at any one or more
18 hotels than any of the others?

19 A. Yes.

20 Q. Where did you most of the sex trafficking?

21 A. Howard Johnson.

22 Q. Is that the Howard Johnson in Bartonsville?

23 A. Yes, next to the truck stop.

24 Q. Why? Why did you spend more time there than anywhere
25 else?

1 A. Because basically it was -- how can you say -- a safe
2 haven for us. Like, we knew when the cops was around, the
3 rooms that we was put in was in the back where there was no
4 cameras working. So we can do basically anything we wanted to
5 do in there.

6 Q. How did you know when the cops were around?

7 A. Because we get a call, and they tell us, like, hey, the
8 police is in the front, the state troopers was in the front.
9 So it the state troopers was in the front of the hotel, like,
10 across the street is food places. So we go -- it's Chili's.
11 It's a few food places over there. So if the police was in the
12 front of the hotel sitting in front of the hotel, we go to one
13 of the food places to eat where we can watch the hotel until
14 the police leave and then go back into the hotel.

15 Q. So you said you would receive a call that the police were
16 there?

17 A. Yeah.

18 Q. Did you ever receive such a call?

19 A. Yes.

20 Q. How many times?

21 A. About two, three times.

22 Q. Who was it that called you?

23 A. Faizal.

24 MR. BROWN: Objection. Speculation of the person on
25 the other end of the line.

1 THE COURT: That's overruled.

2 BY MR. CAMONI:

3 Q. Who was Faizal?

4 A. The manager of the hotel.

5 Q. How did you know Faizal?

6 A. Through Sheryl, through -- yeah, Sheryl, Scarlet.

7 Scarlet, she started prostituting in that hotel around 2010.

8 Her and some other females that she knew at the time, and they

9 got real acquainted with him. And afterwards when we got into

10 the -- when the P. Stones got into the prostitution business,

11 she was already real acquainted with him. We was able to get

12 rooms at a discount price and sometimes even for free.

13 Q. So did you ever talk to this Faizal in person?

14 A. I only had about three -- three times, like, face-to-face
15 contact with him.

16 Q. But you did meet him in person?

17 A. Yes.

18 Q. It wasn't just over the phone?

19 A. No.

20 Q. Do you see Faizal in the courtroom today?

21 A. Yes.

22 Q. Where do you see him?

23 A. Seated in next to his lawyer right there.

24 MR. CAMONI: Let the record indicate the witness has
25 identified the defendant, Faizal Bhimani.

1 THE COURT: Could you describe something he's
2 wearing?

3 THE WITNESS: He got on the blue blazer, and he --
4 the screen is over here. He next to -- he got one lawyer next
5 to him.

6 THE COURT: Okay. The record reflect will reflect he
7 identified the defendant.

8 BY MR. CAMONI:

9 Q. You mentioned that you didn't always pay full price for
10 the Howard Johnson?

11 A. No.

12 Q. How did you get discounts?

13 A. Sometime he give us the coupons or most times Sheryl,
14 like, because Sheryl was a prostitute basically, and sometimes
15 you know, like, I was never there, but when we come to the
16 hotel, like, they would be, like, all right, we going to meet
17 up at 9:00, and she say, yeah, and get rooms for \$50 a room
18 basically.

19 Q. How many rooms -- first of all, who booked the rooms?

20 A. I mainly booked the rooms, me.

21 Q. How did you book the rooms?

22 A. Sometime through hotels.com, or sometime we come in and
23 play cash, things of nature.

24 Q. Did there come a time when you booked rooms -- whose names
25 did you put them in?

1 A. Multiple people's. It depends on who there at the time,
2 who got I. D.

3 Q. Did you ever book a room when you weren't in the area?

4 A. Yeah.

5 Q. So what did you do? Where were you?

6 A. If I in Maine or New York or say anyplace out of state and
7 Sheryl call me, what I do I go on hotels.com. You can book a
8 room, but you don't have to put your name on the room. You can
9 use your card, and you could use basically payment information.
10 And then it say who room do you want the name under, and they
11 give me a name, and I do it like that.

12 Q. Why were you the one booking the rooms?

13 A. Because I had the card, and I had the money.

14 Q. Did the girls keep any money?

15 A. No.

16 Q. So if the girls need a room, they need someone to book it?

17 A. Yes.

18 Q. Why were you booking under somebody else's name?

19 A. Because I wasn't there and also because they needed I.
20 D.s.

21 Q. Did there ever come a time where you couldn't book rooms
22 at the Howard Johnson under your own name?

23 A. No.

24 Q. Were you ever aware of a time when you tried to book a
25 room under your own name and you weren't allowed to?

1 A. No.

2 Q. Did you ever have a problem booking a room at the Howard
3 Johnson hotel?

4 A. No.

5 Q. All right. How many rooms did you rent at a time when you
6 went to the Howard Johnson?

7 A. Three.

8 Q. Why three?

9 A. Because one would be, like, if I'm around, I'm renting
10 three rooms. One is my room, and one room is basically where I
11 keep my drugs and guns if I have a gun when I come down. And
12 one is for the prostitution.

13 Q. Were these rooms near each other?

14 A. Yeah.

15 Q. Would they be connected in some way?

16 A. Yes.

17 Q. So you can move inside the rooms from one room to another?

18 A. Yes.

19 Q. With when you say you kept drugs in one of the rooms,
20 which out of three, if they were next to each other -- which
21 room would have the drugs?

22 A. The one that was connected.

23 Q. The one that was connected to whose?

24 A. Mine.

25 Q. And the girls would be in a different room working?

1 A. Yes.

2 Q. Where in the Howard Johnson were the rooms that you stayed
3 in?

4 A. It was all the way in the back.

5 Q. Was it always in the same --

6 A. Always is the same place. I never seen no more of the
7 hotel but that area. I've never been on any other floors of
8 the hotel but that area.

9 Q. I would like to bring up what's been previously marked as
10 Government's Exhibit 9. Do you recognize what you're looking
11 at?

12 A. Yeah.

13 Q. What is it we see here?

14 A. It's the layout of the hotel.

15 Q. Does this reflect the layout as you remember when you were
16 at the hotel?

17 A. Yes.

18 Q. Now, you said you were only on the first floor, right?

19 A. Yes.

20 Q. So does the first floor section reflect what you remember?

21 A. Yes.

22 Q. All right. Can you indicate to the jury what part of the
23 hotel you are describing when you say your rooms were in the
24 back?

25 A. All right. This right here around from 166, 165, 145,

1 that area back there, like, 186.

2 Q. You are indicating 166 and 145?

3 A. Yeah.

4 Q. Was it somewhere on that back hallway?

5 A. Yes.

6 Q. Is this the area that you're indicating?

7 A. Yes.

8 Q. We can take that down. You said your rooms were always in
9 that same area?

10 A. Yes.

11 Q. Did you request rooms in that area?

12 A. No.

13 Q. You didn't ask to have your room in the back hallway every
14 time?

15 A. No, we didn't have to ask.

16 Q. I would like to bring up what's been previously marked as
17 Government's Exhibit 1.1. Does this look familiar to you, sir?

18 A. Yes.

19 Q. What are we looking at?

20 A. We basically looking at the front of the hotel, the hotel
21 in the sky view.

22 Q. If you were above the hotel looking down?

23 A. Yes.

24 Q. All right. So what part of the hotel did you stay in
25 based on where we're looking now?

1 A. This side right here.

2 THE COURT: You can put your finger on that monitor
3 and then drag a circle around it.

4 THE WITNESS: This side right here.

5 MR. CAMONI: Let the record reflect the witness has
6 circled -- I don't know how to describe this, lower left-hand
7 portion as we look at it on the screen on Government's Exhibit
8 1.1. Your Honor, I move to admit Government's Exhibit 1.1 into
9 evidence.

10 THE COURT: Any objection?

11 MR. BROWN: No objection.

12 MS. PAWELSKI: No.

13 THE COURT: It's admitted.

14 BY MR. CAMONI:

15 Q. When you would check into the hotel in person, who checked
16 you in?

17 A. Faizal nine out of ten.

18 Q. Nine out of ten?

19 A. Yeah.

20 Q. Who checked you in the other times?

21 A. Probably it was only one other -- a female, some chick. I
22 don't know her.

23 Q. Somebody at the front desk?

24 A. Yes.

25 Q. Did that person also put you in the back hallway?

1 A. Yes, because when I'm checking in, nine out of ten I'm
2 checking in with Scarlet so -- and they know her like real
3 well.

4 Q. All right. Did you know anybody else that worked at the
5 Howard Johnson?

6 A. No.

7 Q. What kinds of things did you and the people who stayed
8 with you from the P. Stones do while you were at the Howard
9 Johnson?

10 A. Prostitution, sell drugs, bag drugs up, party, things of
11 that nature.

12 Q. Can you describe some of the parties you are talking
13 about?

14 A. Like, some of the parties would be in -- kind of vulgar --
15 excuse me -- but orgies, things of that nature.

16 Q. Where did these take place?

17 A. In the hotel rooms.

18 Q. Were there ever parties that moved outside of the hotel
19 rooms?

20 A. Yeah, sometime we be in the pool area after dark after the
21 pool area closed. Scarlet get open the pool area. We'd be in
22 the pool area, drinking, smoking.

23 Q. Smoking what?

24 A. Weed.

25 Q. Any other drug use in the pool area?

1 A. Molly.

2 Q. What kind of condition can you describe -- can you
3 describe the condition the pool area would be in after the
4 parties?

5 A. Ashes and cups around the place.

6 Q. You didn't clean it up after?

7 A. No. We didn't leave the bottles though. We took the
8 bottles with us.

9 Q. Did you ever see Faizal when you were at one of these
10 parties?

11 A. Yeah.

12 Q. What was Faizal doing?

13 A. He came in, spoke to Sheryl and left.

14 Q. So he was aware that you were in the pool after hours?

15 A. Yes.

16 Q. When you were having the parties whether in the room or in
17 the pool area, was there ever activity out in the hallways?

18 A. Yeah, some girls would be out there sometimes.

19 Q. Can you describe what the girls would be wearing?

20 A. Lingerie.

21 Q. In the hallway?

22 A. Yes.

23 Q. In the pool?

24 A. Yes. We didn't come with bathing suits.

25 Q. What would they wear when they swam?

1 A. Probably thongs and a bra.

2 Q. Did you ever use drugs when you were in the Howard Johnson
3 hotel?

4 A. Yes.

5 Q. What drugs did you use?

6 A. Molly and weed.

7 Q. Did you ever see other P. Stones use drugs?

8 A. Yes.

9 Q. What drugs did you see other P. Stones use?

10 A. Molly and weed, and the prostitutes would be using heroin.

11 Q. When they used heroin, did they use needles?

12 A. Yes.

13 Q. So did you ever see or did you ever leave needles or
14 baggies or other paraphernalia in the rooms?

15 A. Yes.

16 Q. Did you ever see hotel staff come into the room to clean
17 or for some other reason while those things, needles, baggies
18 and other paraphernalia were out in the open?

19 A. No, they wasn't coming in the rooms to clean because we
20 wouldn't let them come in the rooms to clean. Like, if it was
21 my room and partying -- we partying in my room, they ain't
22 coming to clean. They put the do not disturb sign on there.
23 But in the room that they prostituting in there, they clean
24 them rooms.

25 Q. They clean those rooms?

1 A. Yes.

2 Q. Were those the rooms the girls would use their heroin?

3 A. No.

4 Q. Where would the girls use the heroin?

5 A. They come to my room.

6 Q. So the needles would be left in your room?

7 A. Yes.

8 Q. When you left the hotel, did you take the needles with
9 you?

10 A. No.

11 Q. So they were left in the room?

12 A. Yes.

13 Q. Did you yourself, or did you ever see any other P. Stones
14 do damage to a room at the Howard Johnson?

15 A. Yes.

16 Q. Can you describe what kind of damage you're talking about?

17 A. T.V. knocked over, things broken of that nature.

18 Q. To your awareness, was hotel staff aware of that?

19 A. Yeah.

20 Q. Who was aware of it?

21 A. If the housekeeper came after we left, of course the
22 housekeeper and the manager evidently.

23 Q. While you were there, did anybody find out about it? Did
24 you talk to anybody about it?

25 A. No, I never spoke to nobody about it.

1 Q. Did they ever move to another room?

2 A. No.

3 Q. Did Faizal ever ask you to leave?

4 A. No.

5 Q. When you came -- did you ever come back to check in again
6 after you trashed a room?

7 A. Yes.

8 Q. Were you ever told you couldn't check back in?

9 A. No.

10 Q. Did the police come?

11 A. No.

12 Q. Now, you said that P. Stones -- there were girls working
13 for the P. Stones during prostitution at the hotel?

14 A. Yes.

15 Q. Let's be specific. Were the guys pimping the girls at the
16 hotel?

17 A. Yes.

18 Q. Was Sev working at the hotel?

19 A. Yes.

20 Q. Was he giving the girls heroin to engage in sex acts with
21 customers at the hotel?

22 A. Yes. Arty was also.

23 Q. With who?

24 A. With Millie.

25 Q. Were you?

1 A. Yes.

2 Q. With whom?

3 A. Kenya and Derell. I don't think his girls was using
4 drugs, but they was using weed and things of that nature, but
5 yes.

6 Q. Did you sell drugs while you were at the Howard Johnson?

7 A. Yes.

8 Q. Did you sell drugs to people -- customers outside of the
9 P. Stones?

10 A. Yes.

11 Q. But you also gave drugs to P. Stones members while you
12 were at the hotel, right?

13 A. Yes.

14 Q. Where did you meet with those other customers when you
15 were selling at the hotel?

16 A. In my room where I kept the drugs at.

17 Q. So in one of the rooms in that back hallway?

18 A. Yes.

19 Q. How would the customers come to you?

20 A. They call me, or I call them to tell them I'm up here now
21 and up here at the Howard Johnson, what room, I tell them the
22 room, and when they come to the Howard Johnson, they pull
23 around, and they call me back, I'm here. I tell them, all
24 right, come back to the room. They come right to the room.

25 Q. They come around you mean to the back?

1 A. Yes.

2 Q. Did they come in a back door or come into through the
3 lobby?

4 A. No, the back door.

5 Q. So between the drug sales --

6 MR. BROWN: I didn't area hear that answer.

7 THE WITNESS: The back door.

8 MR. BROWN: Thank you.

9 BY MR. CAMONI:

10 Q. Between the drug sales and the sex trafficking, how much
11 foot traffic was coming into the P. Stones rooms?

12 A. A lot as in -- can I say?

13 Q. Yes.

14 A. If I am running a business and if I see all this traffic
15 coming to my business, I am definitely going to be suspicious
16 of what was going on, and I will know what's going on.

17 MR. BROWN: Objection, Your Honor.

18 THE COURT: That objection is sustained.

19 MR. CAMONI: We will move on.

20 BY MR. CAMONI:

21 Q. Other than the P. Stones you described, did you know any
22 other drug dealers and sex traffickers staying at the hotel at
23 the same time?

24 A. Yeah, it was one dude named Forty that was there one point
25 in time.

1 Q. Okay. Who was Forty?

2 MS. PAWELSKI: I'm sorry to interrupt. I am -- we're
3 having a hard time hearing the witness. Can he possibly get
4 closer to the microphone?

5 THE COURT: Yeah, okay. Sure.

6 MS. PAWELSKI: Thank you.

7 BY MR. CAMONI:

8 Q. Who was Forty?

9 A. Forty was Millie old pimp.

10 Q. Millie's old pimp?

11 A. Yes.

12 Q. Was that before --

13 A. Arty.

14 Q. Arty?

15 A. Yes.

16 Q. Did you see Forty at the Howard Johnson?

17 A. Yes.

18 Q. What were the circumstances when you saw Forty at the
19 Howard Johnson?

20 A. The circumstances was basically Millie went out for a
21 call, and Millie -- he seen Millie in the hallway, and I guess
22 Millie ran back to Arty because all I know is when I come out
23 the hotel, it's -- well, out my room, in the -- next to Arty
24 room is Arty, Millie and Forty arguing. So I come over there
25 because Arty my cousin. I so come over there. They arguing

1 about Millie and about basically Arty stole his hoe -- excuse
2 me -- my language.

3 Q. Back hallway at the Howard Johnson?

4 A. Yes.

5 Q. In front of the room you were staying in?

6 A. Arty basically.

7 Q. Was it a quiet argument or loud?

8 A. No, it was loud.

9 Q. Did you engage in this argument?

10 A. Yes.

11 Q. What happened next?

12 A. Basically I just -- I told Arty, what you want to do, and
13 guns got drawn basically.

14 Q. Let's be specific. Who drew guns?

15 A. I did, Arty and then Forty.

16 Q. The three of you had guns out at each other?

17 A. Not pointed, but, yeah.

18 Q. But out?

19 A. Yes.

20 Q. What happened next?

21 A. Faizal came around the corner and said -- like, basically,
22 like, this how you repay me staying at my hotel, and it was
23 over after that. It was, like, all right, Millie went in the
24 room, Arty went in the room. I went in my room. Forty went in
25 his room, and we never seen him after that.

1 Q. You never saw Forty after that?

2 A. No.

3 Q. Did Faizal ask you to leave the Howard Johnson?

4 A. No.

5 Q. Did the police come?

6 A. No.

7 Q. Did you ever check into the Howard Johnson in the future
8 after that?

9 A. Yes.

10 Q. Were you ever told after that you can't stay here because
11 you were using guns in the back hallway?

12 A. No.

13 Q. You mentioned that -- let me back up.

14 A. Uh-huh.

15 Q. You talked about selling drugs at the Howard Johnson. You
16 talked about the sex trafficking at the Howard Johnson. Did
17 you ever discuss any of this directly with Faizal?

18 A. No. It was only one time I came to check in the hotel,
19 and he just asked me, like, how business doing, and I was,
20 like, fine, and that's it. Other than that, no.

21 Q. He never asked you other than how's business doing -- he
22 didn't ask you what you were doing back there?

23 A. No.

24 Q. Did you ever talk to him about security cameras?

25 A. No. Sheryl basically -- him and Sheryl had that

1 conversation. That's how we knew that.

2 Q. I don't want you to talk about Sheryl's conversation.

3 A. All right.

4 Q. Did you ever talk to Faizal why your rooms were in the
5 back hallway?

6 A. No.

7 Q. He never told you?

8 A. No.

9 Q. You said he called you if law enforcement were around?

10 A. Yes.

11 Q. Did he call you on the room phone or cell phone?

12 A. Room phone.

13 Q. And what did he tell you?

14 A. Basically like, oh, the state troopers are sitting in the
15 front or the Regional sitting in the front.

16 Q. Had you asked him to do that?

17 A. No.

18 Q. All right. What kind of drugs were you keeping in that
19 third room?

20 A. Heroin.

21 Q. Any molly?

22 A. No, molly we had with us because that is party drugs. We
23 sold that, too, but we mainly partied with it.

24 Q. What you sold mainly was heroin?

25 A. Yeah.

1 Q. How much heroin would you have in the Howard Johnson in
2 any given time?

3 A. Between 50 and 500 grams of heroin.

4 Q. How much molly would you bring if you had it with you?

5 A. Probably an ounce or two.

6 Q. How about marijuana? You mentioned marijuana?

7 A. Yeah, I stayed with -- I stayed with marijuana. So I
8 probably have an ounce or two of marijuana with me also.

9 Q. Did you keep any money in that room as well?

10 A. Yeah.

11 Q. Was the money that you kept in that room proceeds from
12 drug sales?

13 A. Yeah, and drug sales and prostitution.

14 Q. How much money would you have in that room at any given
15 time?

16 A. You want the most or the --

17 Q. Give me the most and the least.

18 A. The most was 40,000, the least probably was around -- I
19 would say five to ten thousand.

20 Q. The heroin you brought into the Howard Johnson, was it
21 raw, or was it bagged?

22 A. It was raw.

23 Q. So does that mean you had to bag it before you can sell
24 it?

25 A. Yes.

1 Q. Where did you bag it?

2 A. In the room.

3 Q. Did you ever bag heroin at any other hotels?

4 A. Yeah.

5 Q. What hotel, if any, did you bag heroin at most often?

6 A. Howard Johnson.

7 Q. Did anybody ever help you bag heroin?

8 A. Yes.

9 Q. Did anybody ever help you bag heroin at the Howard
10 Johnson?

11 A. Yes.

12 Q. Who?

13 A. Ashley Jones.

14 Q. Who else?

15 A. Arty, Sev.

16 Q. Somebody named Jenae?

17 A. Yeah, Jenae Evans.

18 Q. She help you, too?

19 A. Yes.

20 Q. Did Ashley Jones ever help you bag heroin in any other
21 hotels?

22 A. Yes.

23 Q. What hotels? Do you remember?

24 A. I forget the name. It's -- I forget the name.

25 Q. But she helped you in another hotel as well?

1 A. Yes.

2 Q. She also helped you bag at the Howard Johnson?

3 A. Yes.

4 Q. How often did you bag heroin at the Howard Johnson?

5 A. Often because that's where I'm going because that's where
6 everybody at.

7 Q. Did you pay the people who helped you to bag heroin?

8 A. No, basically what it was, was I'm selling to dealers.

9 So, like, for instance, Ashley Jones, we bag the heroin, I tell
10 her what to get me off of it.

11 Q. You give her heroin?

12 A. Yes.

13 Q. To help bag?

14 A. Yes, and then tell her -- she was also selling it for me.

15 So I tell her what to give me off of the heroin we bagged
16 together.

17 Q. So would you give her that heroin for her to sell -- where
18 would you give her heroin for her to sell?

19 A. In the room, in the Howard Johnson.

20 Q. She would sell it for you?

21 A. Yes.

22 Q. And she would give you some of the money and keep some for
23 herself?

24 A. Yes.

25 Q. Where would she bring that money to?

1 A. Depending where I'm at, sometime the Howard Johnson or if
2 I go to her house, I go pick it up.

3 Q. And sometimes at the Howard Johnson?

4 A. Yes.

5 Q. Did you know a person by the name of G.?

6 A. Yes.

7 Q. Did you have any interactions with him or see him around?

8 A. Yes, I seen him around, but me and G. wasn't --

9 Q. You didn't work with him?

10 A. No.

11 Q. Did you know what he was doing?

12 A. Yeah.

13 Q. Where did you see him?

14 A. G. I believe -- we seen him at the Howard Johnson before.
15 We seen each other around town driving, things of that nature.

16 Q. You did see him at the Howard Johnson?

17 A. Yes.

18 Q. I would like to show you what's been previously marked as
19 Exhibit No. 27. Do you recognize this picture?

20 A. Yeah.

21 Q. Who is that?

22 A. That's G.

23 Q. Is that a fair and accurate representation of how you knew
24 the person named G. to look?

25 A. Yeah.

1 Q. Is that what he looked like?

2 A. Yeah, yeah.

3 MR. CAMONI: Move to admit Government's Exhibit 27.

4 MR. BROWN: No objection.

5 MS. PAWELSKI: No.

6 THE COURT: It's admitted.

7 BY MR. CAMONI:

8 Q. What did Faizal call you?

9 A. Black.

10 Q. He didn't call you Mr. Taylor?

11 A. No.

12 Q. He didn't call you Sirvonn?

13 A. No.

14 Q. All right. Did you ever witness Sev use force on any of
15 the girls he pimped?

16 A. Yes.

17 Q. Did you ever see Salena Bayer-Davis -- you called her an
18 enforcer?

19 A. Yes.

20 Q. Did you ever see her use force on any girls the P. Stones
21 pimped?

22 A. Yes.

23 Q. You mentioned once earlier in your testimony that you used
24 force against Kenya Evans at one point?

25 A. Yes.

1 Q. Kenya Evans was someone you were pimping?

2 A. Yes.

3 Q. Tell us what happened when you used force on her.

4 A. Hit her one time, slapped her real hard one time.

5 Q. Where were you?

6 A. In the Howard Johnson.

7 Q. Where in the Howard Johnson?

8 A. In the back rooms where I --

9 Q. Were you in the hotel room?

10 A. Yeah, it was in the hotel room at first, and then she ran
11 out the hotel room, and we start arguing. And some of the
12 Stones -- some of the P. Stones came out, and Faizal came
13 around the corner and told us take it back in the room.

14 Q. Now, when you said you struck her, where did you strike
15 her?

16 A. In the face.

17 Q. What was her reaction?

18 A. She was crying and hysterical.

19 Q. She was crying hysterically?

20 A. Yeah.

21 Q. Could you tell us she was hit?

22 A. Yes.

23 Q. How can you tell?

24 A. Kenya was light. When you hit her, you can see the marks
25 on her.

1 Q. Were you also exchanging words? Were you having an
2 argument at the same time?

3 A. Yes.

4 Q. Was it quiet or loud?

5 A. It was loud.

6 Q. Faizal came into the area?

7 A. Yes.

8 Q. He told you what?

9 A. Take it back in the room.

10 Q. What did you do?

11 A. Took it back in the room.

12 Q. In what way?

13 A. I pulled her hair and dragged her -- like, pulled her back
14 in the room.

15 Q. While Faizal was still there?

16 A. Yeah.

17 Q. Did Faizal ask you to leave the hotel?

18 A. No.

19 Q. Did the police come?

20 A. No.

21 Q. Did you ever check into the Howard Johnson again after
22 that?

23 A. Yes.

24 Q. You mentioned you stayed at other hotels in the area?

25 A. Yes.

1 Q. You mentioned that you sold drugs in other states?

2 A. Yes.

3 Q. Maine, and you got drugs in New York?

4 A. Yes.

5 Q. Did you stay in hotels in those states as well?

6 A. Yes.

7 Q. So you stayed in a lot of hotels while you were conducting
8 all this criminal activity, right?

9 A. Yes.

10 Q. In any of those other hotels, did you behave the way that
11 you described how you and P. Stones behaved in the Howard
12 Johnson?

13 A. No.

14 Q. Why not?

15 A. Because they call the cops, or we get kicked and won't be
16 allowed to come back.

17 MR. CAMONI: Nothing further, Your Honor.

18 THE COURT: Mr. Brown. Cross-examine.

19 CROSS EXAMINATION

20 BY MR. BROWN:

21 Q. Good afternoon, Mr. Taylor. My name is attorney Bernie
22 Brown. I have a couple questions for you, all right.

23 A. All right.

24 Q. Receiving stolen property 2004, you were convicted of
25 that, correct?

1 A. Yes.

2 Q. Firearms not to be carried without a license, that's a
3 felony in 2004, you were convicted of that, correct?

4 A. Yes.

5 Q. Homicide out of Monroe County, convicted of that, too?

6 A. Yes.

7 Q. And then there's the two charges in federal court, human
8 trafficking and drug trafficking, correct?

9 A. Correct.

10 Q. Do you think the jury should believe a word that comes out
11 of your mouth here today?

12 A. Yes.

13 Q. Let's test that, why don't we?

14 A. Uh-huh.

15 Q. First thing is, did you tell agent Doherty that you held
16 monthly meetings out of the Super 8 motel in East Stroudsburg?

17 A. Yes, that was -- can I --

18 Q. No, that's the question and answer.

19 A. All right.

20 Q. Is that because you did not have any such arrangement with
21 the Howard Johnson?

22 A. No, that's because at the time -- that was earlier in the
23 gan before we start prostituting or anything like that.

24 Q. Okay. You also had a place called the Pocono -- P. C. P.,
25 the Pocono County Place? Didn't one of your prostitutes like

1 Heather D-Auria purchase a house where you guys operated out
2 of?

3 A. No, we lived out of there. We didn't operate out of it.

4 Q. Okay. So you guys lived in that house, correct?

5 A. Yes, some of the Stones, yes.

6 Q. And did you also tell agent Doherty that you operated out
7 of the Budget Inn motel?

8 A. I believe so.

9 Q. Okay. Do you agree that investigators were initially
10 interested in your gang and your activities in particular as
11 the leader?

12 MR. CAMONI: Objection, Your Honor. How would this
13 witness know what investigators were interested in?

14 THE COURT: I will sustain it. You can rephrase it.

15 BY MR. BROWN:

16 Q. Did investigators tell you that the focus of their
17 investigation was you and your gang?

18 A. Yes.

19 Q. Did -- when they told you that, did you say, when you chop
20 the head off the body falls?

21 A. Yes.

22 Q. And that meant when you were arrested, your gang fell
23 apart, correct?

24 A. Yes.

25 Q. And when you were arrested in June 20th of 2014, you were

1 arrested for prostitution and drug dealing, correct?

2 A. No.

3 Q. Okay. You were arrested at the Econo Lodge on June 20th
4 of 2014?

5 A. Yes.

6 Q. You were there with another individual, correct?

7 A. Yes.

8 Q. Okay. And you're saying that the purpose of that
9 investigation was not because you were engaging in prostitution
10 and drug trafficking?

11 A. What I'm saying -- you asked me did I get arrested in 2014
12 for prostitution, no, I did not. I got arrested in 2014, June
13 20th, for solicitation of criminal homicide. The prostitution
14 charge and the drug charge came in September 22, 2015.

15 Q. Okay. So then I misspoke. So you were arrested on June
16 20th of 2014, and there was a similar investigation for you
17 operating a drug and prostitution ring out of the Econo Lodge
18 later in 2015?

19 A. I don't know if it was just out of the Econo Lodge. I
20 can't speak for no one else.

21 Q. Fair enough. You were interviewed two times in June of
22 2014 and December of 2014 by investigators. Do you recall
23 that?

24 A. Yeah.

25 Q. Okay. And at no time during neither one of those

1 interviews -- at no time during either of those interviews did
2 you mention any arrangement with the Howard Johnson or Faizal
3 Bhimani?

4 A. No.

5 Q. Then did you reach an agreement with the government to
6 cooperate?

7 A. Yes.

8 Q. Okay. And, in fact, in March 5th of 2015, March 13th of
9 2015, you reached out to agent Doherty for him and agent Patton
10 to come see you, correct?

11 A. Yes.

12 Q. And at that time did you ask them to give you a better
13 deal for your charges?

14 A. I didn't ask him for a better -- I told them I wanted to
15 cooperate.

16 Q. Right. But did you -- let me ask you. Did you ever say
17 during that interview that you wanted a better deal?

18 A. No.

19 Q. Did you ever say in any of the interviews that you wanted
20 a better deal?

21 A. No, I said -- what I said was in any interview I am trying
22 to get home to my kids. I never asked for a better deal.

23 Q. So you wanted consideration to mitigate your sentence. Is
24 that true?

25 A. If I'm going to cooperate, yes.

1 Q. Okay. So is it true then you were looking for something
2 from your -- the information you were providing?

3 A. Yes.

4 Q. Now, during the March 15th interview, is it true that the
5 first thing that you do is you tell case agents you lied to
6 them in the previous interviews?

7 A. No, I don't recall telling them that.

8 Q. Okay.

9 MR. BROWN: I'm going to mark this as Defendant's
10 Exhibit No. 5, Your Honor. It is his March 15th interview.
11 It's to impeach him with what he said to case agents.

12 THE COURT: Is it his statement?

13 MR. BROWN: It's his statement that was recorded, and
14 he was asked a question, and the first thing he does --

15 THE COURT: First of all, let's have this
16 conversation --

17 MR. BROWN: Sidebar. I apologize.

18 THE COURT: You should know that.

19 (The following discussion took place at sidebar:)

20 THE COURT: Is this a 302 or is this a tape-recorded
21 --

22 MR. CAMONI: I think video.

23 THE COURT: This is his actual statement?

24 MR. BROWN: His actual statement. He's asked the
25 question.

1 THE COURT: You can ask him about that. I thought it
2 was -- sounded to me you are talking he told the agents it was
3 a 302 you were going to use.

4 MR. BROWN: No.

5 THE COURT: It's his own statement. That's -- you
6 can ask him a question about it. Please be careful about if
7 there's -- if you have an argument to make for something that's
8 admissible that you don't have that argument if it turns out --
9 if that had been, for example, a 302 statement, you are telling
10 this jury, I have this statement he said, I don't want to have
11 a whole lot of sidebar conferences if it turns out you think
12 your argument will do something that can poison the jury before
13 the ruling. Please don't do that. All right.

14 MR. BROWN: I'm sorry.

15 THE COURT: That's okay. It's a -- do you want to
16 say something?

17 MS. ROBERTS: Exhibit number?

18 MR. BROWN: Five.

19 MS. ROBERTS: What was four?

20 THE COURT: Four would be your next one.

21 MS. ROBERTS: I want to make sure I didn't miss one.

22 MR. DeSTEFANO: All of those are simply for
23 identification and not to be admitted?

24 THE COURT: Certainly the 302s that we talked about
25 were either under 612 or 613, so they are for purposes of

1 refreshing recollection. None of them were for past
2 recollection recorded as a prior inconsistent statement. I
3 don't know what this will be depending how it's used. I assume
4 it will be used for good faith basis to cross-examine or
5 refresh his recollection, under which case it wouldn't come in.
6 You're right.

7 (The discussion at sidebar concluded.)

8 MR. BROWN: Mr. Taylor, who is that on the screen?

9 THE WITNESS: That's me.

10 THE COURT: Mr. Brown, are you using video as opposed
11 to a transcript --

12 MR. BROWN: To impeach him, Your Honor. He said he
13 didn't remember -- I asked him --

14 THE COURT: Any objection to --

15 MR. CAMONI: Judge, I don't know -- prior
16 inconsistent statement if it is, I guess the witness has denied
17 making it.

18 MR. BROWN: Yes.

19 THE COURT: So I am going to allow the video. I
20 think the witness is here able to be cross-examined and able to
21 be redirected as it may be. So I'm going to -- I am going to
22 allow you to use that. I will turn the monitors on. You might
23 need to make sure that -- Barbe. Mr. Brown, this is
24 Defendant's Exhibit 4?

25 MR. BROWN: Four, thank you.

1 BY MR. BROWN:

2 Q. So did you, Mr. Taylor, tell case agents you lied?

3 A. Yes, I said I kind of lied. Can I say something? This
4 was March 13th, 2015. It was five years ago. I didn't recall
5 that at that time, you know.

6 Q. And who was in that video? Do you recall?

7 A. Myself.

8 Q. Okay.

9 A. The other agent, and I forget their names.

10 Q. That's fine. Fair enough. Next were you asked during the
11 interview about the hotels in the Stroudsburg area that had
12 girls being run out here, meaning being prostituted out here.
13 And did you say no to that, you didn't know anything about
14 that? Were you asked about the hotels and girls being run out
15 of hotels, and you denied that?

16 A. I'm trying to -- can I -- not to high step. I am trying
17 to think back. It was five years ago this interview happened
18 so --

19 Q. I understand that.

20 A. No, I believe I told them that girls was being ran out of
21 hotels, that it was prostitution involved.

22 Q. Okay. Fair enough. So it's your answer you did tell
23 them?

24 A. That it was prostitution being involved, that Sev was a
25 pimp.

1 Q. Fair enough. Can I get to 9:58:20? Who were you talking
2 about there? Do you know?

3 A. No, I forget.

4 Q. Okay, fair enough. And were you asked about payment and
5 force and dope that you -- when you were asked about payment
6 and force during this interview, did you say you didn't know
7 anything about force being used on girls?

8 A. Yes.

9 Q. That was a lie, correct?

10 A. Yes.

11 Q. Did you -- were you then asked about moving drugs and
12 girls from your operation out here in Pennsylvania, and you
13 told them that you were not doing that?

14 A. Myself. I said myself, I told them that I was -- I was
15 moving drugs but not girls. I told them I was just renting
16 rooms, I believe.

17 Q. Was that a lie?

18 A. That I was just renting rooms?

19 Q. Right.

20 A. Yes.

21 Q. And did you try to tell the case agents that members of
22 your gang the P. Stones actually had legal and legitimate jobs
23 out here?

24 A. I said myself.

25 Q. Right. But did you say other members have, like, legal

1 and legitimate --

2 A. Yeah, some members because they did.

3 Q. Was that a lie? Were you trying to divert the agents from

4 --

5 A. It wasn't a lie because some P. Stones did have jobs. I'm

6 not lying when -- if you asked me did this person have a job,

7 yes, this person had a job.

8 Q. Okay. And did you try to tell case agents there were no

9 dues to be paid for your gang?

10 A. There was dues to be paid.

11 Q. Yeah, but did you tell case agents there were no dues for

12 your gang?

13 A. Yes.

14 Q. Okay. Was that a lie?

15 A. Yes.

16 Q. And did you also tell them that the female members of your

17 gang weren't sexed in for initiation?

18 A. Yes.

19 Q. Was that a lie?

20 A. Yes. And that's when I was still involved in the gang at

21 the time. I was still the leader of the gang March 13th, 2015.

22 Q. You just testified that your gang did have meetings,

23 correct?

24 A. Yeah.

25 Q. Okay. Those meetings occurred at the Super 8 and Budget

1 Inn, correct?

2 A. That was before 2011, yes.

3 Q. I understand that. But my next question -- the reason why
4 I brought you back to that is did you try to tell case agents
5 in 2015 that your group wasn't having meetings?

6 A. Yes.

7 Q. And was that a lie?

8 A. Yes.

9 Q. And did you tell case agents that there were no discipline
10 for women or women weren't treated any worse or sexually abused
11 by your gang?

12 A. Yes.

13 Q. Was that a lie?

14 A. Yes, it was.

15 Q. And did you try to tell the case agents that you weren't
16 actually involved in the prostitution racket that your gang was
17 running?

18 A. Yes.

19 Q. And was that a lie?

20 A. Yes, and that was all before -- can I say this? This was
21 all before I signed my -- my cooperation deal truthfully.

22 That's what I'm doing now, and at this time, like I said, I was
23 still very much into the gang, and I was still very much a part
24 of the gang.

25 Q. Did you also tell case agents that you weren't into the

1 drug activities of your gang either?

2 A. Yes.

3 Q. And that was a lie?

4 A. Yes.

5 Q. And did the case agents specifically ask you about Vicious
6 or Salena Bayer during the interviews?

7 A. They asked we about Sev. I don't remember. I believe
8 they probably did ask me about Salena. I know they asked me
9 about Sev for sure.

10 Q. You keep saying it was before. And specifically were they
11 asking about Salena running girls in 2012? Do you recall that
12 question?

13 A. I don't remember.

14 Q. Fair enough. Can we go to 10:41:20? Did you say that?

15 A. Yes.

16 Q. And was that a lie?

17 A. Yes.

18 Q. Okay. And how about did case agents ask you about Kenya
19 Evans and whether or not she was bringing drugs from
20 Pennsylvania to Maine?

21 A. Yes.

22 Q. And did you tell them that she wasn't?

23 A. Yes.

24 Q. And was that a lie?

25 A. Yes.

1 Q. And did case agents ask you about whether or not Kenya
2 Evans was prostituting?

3 A. Yes.

4 Q. And you told her she wasn't, correct?

5 A. Yes.

6 Q. And that was a lie?

7 A. Correct.

8 Q. How about Sheryl Patishnock? Is it true you said that
9 Scarlet was a prostitute forever since 2008 and the girls she
10 was running she was running because she wanted money?

11 A. Yes.

12 Q. Okay. That wasn't a lie, correct?

13 A. What was a lie?

14 Q. That was not a lie that Scarlet was running her own girls
15 for her own money and --

16 A. What Scarlet was doing before she got with Sev, her and
17 girls get together, and like I said, they would prostitute, and
18 Scarlet was -- she was doing her own thing.

19 Q. Right. She was doing that for money, correct?

20 A. Yes.

21 Q. And did she give some of that money to the gang?

22 A. Yes.

23 Q. And with regard to Scarlet's money, were you ever asked
24 about whether or not her money -- the rest of that money was
25 her money to keep when she was running the girls? So when

1 Scarlet was running the girls, she paid her dues or paid the
2 money to the gang, and she kept the remaining of the proceeds?

3 A. Yes. That was before Sev got involved and the gang got
4 involved in the prostitution business.

5 Q. But you were specifically asked about 2012, correct? Do
6 you recall that?

7 A. I believe so, probably.

8 Q. Okay. You're giving an interview in 2015, correct?

9 A. Yes.

10 Q. Are you aware that the -- that the indictment is from 2011
11 to 2017?

12 A. Yes.

13 Q. And did case agents specifically ask you about receiving
14 money from prostitution?

15 A. Yes.

16 Q. And did you lie to them and tell them you did not?

17 A. Yes, I did.

18 Q. And did you deny even being involved in the pimping or
19 prostitution game in your 2015 interview?

20 A. Yes, I did.

21 Q. And that was a lie?

22 A. Yes.

23 Q. Now, beginning of your testimony -- actually, I'm going
24 somewhere first. I want to talk to you about the Howard

25 Johnson situation, okay. And what I mean is, when you're

1 operating out of the Howard Johnson, do you agree it's to your
2 benefit that you operate without people knowing that you're
3 selling drugs so they don't call the cops?

4 A. Yeah.

5 Q. Yeah. You would want to operate so people don't know that
6 you're operating out of whatever hotel room you're in to sell
7 drugs, correct?

8 A. Can I answer? The whole thing about using --

9 Q. Is it yes or no?

10 A. Using the Howard Johnson, the back rooms wouldn't have no
11 regular --

12 THE COURT: Okay. So we're clear on this yes or no
13 business, all right, you can ask a witness to answer yes or no.
14 If they can answer it completely in yes or no, they can do
15 that, but they can also add a short explanation if a yes or no
16 doesn't honestly answer the question that's being asked, okay.
17 Go ahead. Ask the question.

18 BY MR. BROWN:

19 Q. I will ask it again. I just asked, is it true it benefits
20 you that people don't know that you're operating your drug
21 operation out of a hotel room so you don't get caught?

22 A. Yes.

23 Q. Okay. Would it be the same thing with operating a
24 prostitution ring out of -- out of the same hotel?

25 A. Yes.

1 Q. Now, you were indicted for drug trafficking and human
2 trafficking October 2nd, 2015, correct?

3 A. I was indicted -- I got my indictment papers that said the
4 indictment was September 22nd, 2015.

5 Q. Okay. So my bad. I was off by a little -- September --
6 September 22nd, 2015, correct?

7 A. Yes.

8 Q. And once you did that, you wanted to cooperate and help
9 yourself, correct?

10 A. Yes.

11 Q. Okay. And I know that attorney Camoni had talked to you
12 about what you get for your cooperation. The reason why you
13 were doing that was not only to protect yourself, is that true?
14 Were you trying to protect somebody else by cooperating, sir?

15 A. Was I trying to protect somebody else like who?

16 Q. Like Arty Taylor, your cousin, did case agents tell you
17 they would throw a life preserver to Arty Taylor if you
18 cooperated?

19 A. No, what agents said was if I can get Arty Taylor to
20 cooperate it would help me.

21 Q. Okay.

22 A. They never said that if I cooperated that it would help
23 Arty Taylor, like, Arty wouldn't get locked up or anything like
24 in that aspect.

25 Q. It's your testimony under oath that case agents did not

1 tell you that if there's one person to throw a life preserver
2 for?

3 A. They asked me if I had a -- like you said, if I can help
4 anybody, who would I help.

5 Q. Right.

6 A. I said my cousin.

7 Q. And so --

8 A. That's why at the end of this -- at the end of this video
9 as you can tell, they asked me about Arty, and I start crying,
10 and I didn't say nothing else after that.

11 Q. Now, you said it's your motivation to get home to your
12 kids as soon as possible, correct?

13 A. Yes.

14 Q. Isn't that -- isn't that why you're testifying against Mr.
15 Bhimani here today, sir?

16 A. Yes.

17 MR. BROWN: No further questions, Judge.

18 THE COURT: Okay. Thank you, Mr. Brown. Ms.
19 Pawelski?

20 CROSS EXAMINATION

21 BY MS. PAWELSKI:

22 Q. Good afternoon, Mr. Taylor.

23 A. Good afternoon.

24 Q. I am Terri Pawelski. If you don't understand any of my
25 questions, let me know, and I will try to rephrase them, okay?

1 A. All right.

2 Q. I will ask you about your plea agreement. Count one, do
3 you remember what count one was?

4 A. Drugs.

5 Q. And do you remember what count two was?

6 A. Sex trafficking.

7 Q. How much time were you looking at for both charges?

8 A. I'm not sure.

9 Q. You are not sure?

10 A. No, it was on my P.S.I., I believe, maybe like 25 years, I
11 believe.

12 Q. You were looking at a mandatory minimum of 25 years in
13 prison, correct?

14 A. Not a mandatory minimum, no, ma'am.

15 Q. How much time are you serving?

16 A. 20 years and eight to 16 on my state case.

17 Q. And you received a 5 K. in exchange for your cooperation,
18 correct?

19 A. No, I haven't.

20 Q. You didn't sign an addendum to a plea agreement in this
21 case with the government?

22 A. Yes, I have.

23 Q. And do you understand that the government if it agrees
24 that you have -- that you have cooperated with the government
25 that it can file a 5 K.?

1 A. Yes, that was for my case basically.

2 Q. Your case?

3 A. Yes.

4 Q. And that means that the Court can then go below the
5 sentencing guidelines range, correct?

6 A. Yes.

7 Q. And who determines whether or not you've told the truth
8 today?

9 A. The jury.

10 Q. The government, isn't it? The government decides under
11 your plea agreement whether you've breached the agreement,
12 isn't that true?

13 A. I'm not sure.

14 Q. All right.

15 MS. PAWELSKI: If can have one moment, Your Honor.
16 Kevin, can you bring up page nine, please, of -- I am not sure
17 what exhibit it is.

18 THE COURT: Government's Exhibit 17?

19 MS. PAWELSKI: Can we bring it up for the witness?
20 Page 00002489. It's paragraph 13.

21 BY MS. PAWELSKI:

22 Q. Mr. Taylor, do you understand that it was the government
23 who's entitled to make a sentencing recommendation in your
24 case?

25 A. Yes.

1 Q. That was based upon everything that they asked you to do
2 in order to cooperate?

3 A. Yes, everything that -- if they came to question me about
4 anything in that aspect, yes.

5 Q. And it's the government who decides whether or not you
6 breached this plea agreement?

7 A. Yes.

8 Q. Whether you breached the plea agreement and whether or not
9 they accepted your testimony as truthful?

10 A. Yes.

11 Q. Okay.

12 MS. PAWELSKI: I have nothing further, Your Honor.

13 THE COURT: All right. Any redirect?

14 MR. CAMONI: Briefly.

15 REDIRECT EXAMINATION

16 BY MR. CAMONI:

17 Q. Mr. Taylor, Ms. Pawelski asked you about whether you've
18 received a 5 K. motion. Are you familiar with what that is?

19 A. Yes.

20 Q. Did you understand what she was asking about?

21 A. Did I receive time off for my cooperation.

22 Q. So a motion by the government to reduce your sentence?

23 A. Yes.

24 Q. Did the government ever file that motion before you were
25 sentenced?

1 A. No.

2 Q. So you have not received a benefit for your cooperation,
3 correct?

4 A. No.

5 Q. But you think based on the agreement that if you provide
6 what's called in the cooperation agreement substantial
7 assistance that you may receive one, correct?

8 A. Yes.

9 Q. And what do you have to do in order to get any benefit?

10 A. Tell the truth.

11 Q. And what would you have to do in order to lose all that
12 benefit?

13 A. Lie.

14 Q. Is there anything in your cooperation agreement that says
15 you're only going to benefit if the government wins the case?

16 A. No.

17 Q. All right. We saw a video interview from 2015, correct?

18 A. Yes.

19 Q. Do you remember how many times you've been interviewed in
20 this case?

21 A. No.

22 Q. Okay. So let me ask you this. Early on after you were
23 arrested, you were interviewed before you were indicted, right?

24 A. Yes.

25 Q. Before you knew they were charging you -- we were charging

1 with you sex trafficking and drug trafficking, correct?

2 A. Yes.

3 Q. You admitted you lied to investigators?

4 A. Yes.

5 Q. Early on you lied to the investigators, correct?

6 A. Yes.

7 Q. Was that interview in 2015 before or after you pled guilty
8 to the charges in this case?

9 A. That was before.

10 Q. So then after that interview that we saw you came into a
11 courtroom for a plea hearing, right?

12 A. Yes.

13 Q. And you told the Court, yes, I did it?

14 A. Yes.

15 Q. So you had lied to investigators in the interview?

16 A. Yes.

17 Q. But then you pled guilty when you knew you were facing
18 substantial penalties, correct?

19 A. Yes, can I say something towards that? What I would like
20 to say in the beginning -- in this interview right here, of
21 course, I am going to lie because I am not yet -- I didn't get
22 indicted. So I'm basically trying for me myself not to get
23 indicted, not to get federally prosecuted. So, of course, I
24 said some things in that interview that was a lie because at
25 that time I wasn't prosecuted yet. I wasn't federally indicted

1 yet. So I was basically trying to get myself out of being
2 federally indicted so certain things they asked me I didn't
3 tell the truth. Certain things they brought up I lied.

4 Q. In later interviews when you were asked those same
5 questions again, did you then tell the truth?

6 A. Yes, because if I didn't tell the truth and it came out
7 that I lied, I wouldn't get my credit. So it was either
8 basically I tell the truth and/or I lie and I keep lying, and
9 it came down to me basically telling the truth, like, you know.
10 I lied at that time also because everybody have morals, and
11 some people are ashamed what they did, and I was ashamed, and I
12 am ashamed of the things I did at that time, and that was five
13 years ago, and I'm not that person that was on this video.
14 That's not me no more.

15 Q. I want to ask you about some of the other hotels that
16 defense attorneys asked about you that Mr. Brown asked you
17 about. So you did sell drugs and prostitution out of the Super
18 8 Motel, correct?

19 A. Yes.

20 Q. Did a manager or employee there warn you when police were
21 around?

22 A. Yes.

23 Q. At the Super 8?

24 A. No, no, not the Super 8, no.

25 Q. Did anybody that worked at the Super 8 warn you when

1 police were around?

2 A. No.

3 Q. Were you able to throw big parties and wreck rooms?

4 A. No.

5 Q. Did the manager at the Super 8 warn there were police?

6 A. No.

7 Q. Were you able to do it without having police called?

8 A. No.

9 Q. Mr. Brown pointed out you were arrested at the Econo
10 Lodge. Is that right?

11 A. Yes.

12 Q. At the time you were arrested at the Econo Lodge, did
13 anyone warn you police were arresting you?

14 A. No.

15 Q. You were arrested?

16 A. Actually they went in because Salena and the other girl
17 was in there, and they set up a sting. They went in, and I --
18 I went out to get some food, and I came back, and when I was
19 coming back, I passed the office. And then I walk right to the
20 room, and I got locked up. So that tell you, no, they ain't
21 warning me in the office. They could have warned me.

22 Q. Fair enough. You testified earlier that the Howard
23 Johnson -- you did receive warnings from Faizal Bhimani about
24 police, correct?

25 A. Yes.

1 Q. Did you ever get arrested at the Howard Johnson?

2 A. Never.

3 Q. So would you say those warnings worked?

4 A. Yes.

5 MR. CAMONI: Nothing further, Your Honor.

6 THE COURT: All right. You may step down. Thank
7 you. All right. Let me see counsel for a second. In the
8 meantime, we have to sanitize our witness area. You are
9 welcome to stand and stretch.

10 (A discussion was held off the record at sidebar.)

11 THE COURT: Okay. Ms. Roberts, your next witness.

12 MS. ROBERTS: Thank you, Your Honor. The government
13 is going to call Salena Bayer-Davis.

14 SALENA BAYER-DAVIS, called as a witness, being duly
15 sworn, testified as follows:

16 DIRECT EXAMINATION

17 BY MS. ROBERTS:

18 Q. Good afternoon, ma'am.

19 A. Good afternoon.

20 Q. Can you tell the jury how old are you today?

21 A. 26 years old.

22 Q. How far did you go in school?

23 A. I finished high school.

24 Q. Where did you grow up?

25 A. Stroudsburg, Pennsylvania.

1 Q. Who did you live with growing up?

2 A. My mom until the age of 16.

3 Q. Why just until the age of 16?

4 A. My mom passed away when I was 16.

5 Q. After your mom passed away, who did you live with?

6 A. My grandmother.

7 Q. Did you stay up in the Stroudsburg area with your
8 grandmother?

9 A. The Saylorsburg area.

10 Q. Is that in Monroe County?

11 A. Yes, ma'am.

12 Q. Are you familiar with the gang called the P. Stones?

13 A. Yes, ma'am.

14 Q. Can you explain to the jury how you became familiar with
15 that gang?

16 A. I was introduced to the gang by two of my cousins, and I
17 joined the gang after my mom died.

18 Q. You said you were introduced to the gang by two of your
19 cousins. What are their names?

20 A. Ellanita and Kenya Evans.

21 Q. Approximately how old were you when you actually joined
22 the gang?

23 A. I was 17 when I joined the gang. I was hanging out with
24 them when I was 16 though.

25 Q. What type of gang is the P. Stones?

1 A. They are considered Blood.

2 Q. Can you explain to the jury how it was that you became a
3 member of the P. Stones?

4 A. When I turned Stone, I was boot in, which is you fight.
5 Then I had to encounter a 21-day period where you had sex with
6 individual -- with higher ranks.

7 Q. How old were you at this time?

8 A. I was 17.

9 Q. When you said you to fight, who did you have to fight?

10 A. It was five different women of Black's choice.

11 Q. Of whose's choice?

12 A. Black.

13 Q. Who is Black?

14 A. Sirvonn Taylor.

15 Q. Who was Black in the P. Stones?

16 A. He was the prince.

17 Q. What does that mean to be the prince in the P. Stones?

18 A. He was the highest member of the gang.

19 Q. You said there was another way that you entered the gang?

20 A. Yes, ma'am.

21 Q. Can you just explain to the jury what that was?

22 A. So 21-day period is we had to have sexual intercourse with
23 Black, Jamiell, Sev, people who were higher ranks than what we
24 were, and you had to do it for 21 days.

25 Q. And did you have a gang name or street name once you

1 became Stone?

2 A. Yes, ma'am.

3 Q. What was that name?

4 A. It was Vicious Stone.

5 Q. At some point were you arrested for your activities
6 related to becoming a P. Stone member?

7 A. Yes.

8 Q. Do you recall when that was?

9 A. It was arrested officially in October of 2015.

10 Q. Do you remember what you were arrested for?

11 A. I was arrested for conspiracy to sex traffic by force or
12 coercion.

13 Q. Did you enter into a plea agreement with the government
14 based upon that charge?

15 A. Yes, ma'am.

16 Q. I am going to show you what's been marked Government's
17 Exhibit 25.

18 A. On the screen?

19 Q. Yeah, it should come up on your screen. Are you able to
20 identify what Government's Exhibit 25 is?

21 A. Yes, ma'am.

22 Q. What is it?

23 A. That's my written plea agreement.

24 Q. If we can flip to the last page of that plea agreement,
25 which would be page 25.

1 A. Yes, ma'am.

2 Q. Do you see anything there that's particular to you?

3 A. That's my signature.

4 Q. And did you have an attorney when you signed this plea
5 agreement?

6 A. Yes, ma'am.

7 Q. Is his signature on there as well?

8 A. Yes, ma'am.

9 MS. ROBERTS: Your Honor, the government is going to
10 request that Government's Exhibit 25 be moved into evidence.

11 THE COURT: Any objection?

12 MR. BROWN: No objection, Your Honor.

13 THE COURT: Objection.

14 MS. PAWELSKI: No. My apologies.

15 THE COURT: No objection? It's admitted.

16 BY MS. ROBERTS:

17 Q. Salena, what did you plead guilty to?

18 A. I pled guilty to the conspiracy count.

19 Q. I am going to show you paragraph one of Government's
20 Exhibit 25.

21 A. Yes, ma'am.

22 Q. And does paragraph one state exactly what you pled guilty
23 to?

24 A. Yes, ma'am.

25 Q. What specifically was that charge?

1 A. Ma'am, can you rephrase the question?

2 Q. What specifically was the charge?

3 A. Oh, it says the defendant agrees to plead guilty to count
4 two of the indictment which charges the defendant with a
5 violent --

6 Q. Was the charge conspiracy to commit sex --

7 A. Yes, ma'am. It says conspiracy to commit sex trafficking
8 by threats of force or coercion.

9 Q. What's the maximum penalty as indicated in paragraph one
10 of exhibit 25?

11 A. The maximum penalty is either life imprisonment for life
12 and a fine up to \$250, 000.

13 Q. Thank you. Was there any agreement with regard to your
14 sentence?

15 A. No, ma'am.

16 Q. Did you also enter into a cooperation plea agreement with
17 the government?

18 A. Yes, ma'am.

19 Q. I'm going to show you what's been marked Government's
20 Exhibit 26. That will pop up on your screen. Do you recognize
21 what Government's Exhibit 26 is?

22 A. Yes, ma'am.

23 Q. What is it?

24 A. It's my cooperation. It's a -- I can't pronounce that
25 word to my plea agreement. I'm sorry.

1 Q. That's okay. That's okay. It's your cooperation plea
2 agreement?

3 A. Yes, ma'am.

4 Q. Okay. I'm going show you the last page of that plea
5 agreement. Is there anything on that last page of Government's
6 Exhibit 26 that's particular to you?

7 A. Yes, ma'am, that's me, my lawyer and Mr. Fran Sempa's
8 signature.

9 Q. And based upon this agreement, did you agree to provide
10 truthful information to the government?

11 A. Yes, ma'am.

12 MS. ROBERTS: Your Honor, the government is going to
13 request that government's 26 be moved into evidence.

14 MR. BROWN: No objection, Your Honor.

15 THE COURT: Any objection?

16 MS. PAWELSKI: No.

17 THE COURT: That's admitted under seal that
18 particular exhibit, all right.

19 BY MS. ROBERTS:

20 Q. Have you already been sentenced in your case based upon
21 the charge of the conspiracy to commit sex trafficking?

22 A. Yes, ma'am.

23 Q. And what was the sentence that you received?

24 A. I received 34 months, which is three years.

25 Q. In exchange for your cooperation, were you promised a

1 reduction in sentence?

2 A. No, ma'am.

3 Q. Did the government at the time of your sentencing request
4 a reduction in your sentencing?

5 A. No, ma'am.

6 Q. Do you expect at the end of your testimony here today that
7 the government will request a reduction in your sentence?

8 A. I don't expect it, but I hope it.

9 Q. Was that the only time that you were charged with a
10 criminal offense?

11 A. No, ma'am.

12 Q. Did you also enter a guilty plea to a false information
13 misdemeanor charge in 2019?

14 A. Yes, ma'am.

15 Q. If you can explain to the jury why it was that you wanted
16 to become a member of the P. Stones.

17 A. Growing up I didn't have my dad. My dad was in and out,
18 never really cared, cared more about his woman than his kids.
19 My mom when she died, it was my only piece of family I really
20 had. When I met Sirvonn, he knew my story, and he told me that
21 they would be the family that I didn't have. It sounded good
22 from the outside looking in, you know. Everything that
23 glitters isn't gold. But when you got into the gang, it was
24 totally different than what you expect it.

25 Q. When were 17 years of age, is that what you were looking

1 for, family?

2 A. Yeah, I was just looking for somebody who cared about me.

3 Q. When you became a member of the gang, did people tell you
4 what to do who were already members of the gang?

5 A. Yes, ma'am.

6 Q. What types of things were you told to do?

7 A. We were told when to violate people.

8 Q. What's violate people mean? What does that mean?

9 A. A violation is -- let's say I did something that a gang
10 member didn't approve, like, Black or Sev somebody higher up
11 than me, they would put me in a violation where I would have to
12 be beat up by five girls.

13 Q. And did that ever happen to you?

14 A. Yes, ma'am.

15 Q. Did you ever violate other individuals?

16 A. Yes, ma'am.

17 Q. And were you told to do that by other members of the gang?

18 A. Yes, ma'am, if you didn't, you'd be next.

19 Q. If you didn't, I'm sorry. I didn't hear what you said.

20 A. If you didn't do the violation, you would receive a
21 violation.

22 Q. And did you want to receive a violation?

23 A. No, ma'am.

24 Q. Can you remember some of the other members of the P.
25 Stones?

1 A. Yes, ma'am.

2 Q. Start with some of the males. Was it both males and
3 females obviously?

4 A. Yes, ma'am.

5 Q. Okay. So what are the males you remember who were actual
6 members of the P. Stones?

7 A. Arthur Taylor, which was Arty, Sirvonn Taylor, which was
8 Black, Jose Velazquez, which was Sev, Jamiell Sims, which was
9 Mills, Don P., his real name was Paul, B. Nasty, Buddha.

10 Q. What about the females? Can you remember any females
11 other than yourself that were actual members of the P. Stones?

12 A. Yes, ma'am, there was Baby, who was Abigail Hendrix.
13 There was Scarlet, who was also Sheryl Patishnock, Ellanita
14 Evans, who was also L. Stone, Jordan Capone, who was also Angel
15 and Lady, who was also Yohanna Bradley.

16 Q. What were some of the rules the P. Stone members had to
17 follow?

18 A. Some of the rules were like if you were big homie called,
19 you had to do it.

20 Q. What did you say, if you were what?

21 A. Big homie called.

22 Q. What does that mean big homie?

23 A. For instance, one day we were in the room and I was big
24 homie called to go to the store and I didn't want to do it, and
25 he tried to violate me for that. If a big homie tells you to

1 do something, you do it. They'll say, I big homie call you to
2 do whatever, whether it's go to the gas station, you know.

3 Q. In the beginning, did you mind doing things for the big
4 homies?

5 A. No, not until it became, like, criminal activity, you
6 know.

7 Q. At some point you had testified that in the beginning you
8 lived with your grandmother in Saylorsburg. At some point did
9 you moved out of your grandmother's house?

10 A. Yes, ma'am, in the summer of 2012, I took my money from my
11 mom's death, and I got a house on Main Street -- if I am not
12 mistaken, the address was 2002 Main Street, Stroudsburg, P.A.,
13 18360.

14 Q. In 2012 approximately, how old were you when you got that
15 house?

16 A. I was turning 18.

17 Q. Who stayed at that house with you?

18 A. Everybody.

19 Q. When you say everybody, do you mean P. Stones members?

20 A. Yes, ma'am.

21 Q. What about individuals who hung out with the P. Stones who
22 weren't members, did they -- did the P. Stones allow people to
23 hang out with them that weren't actually members?

24 A. Yeah, we'd call them 550s though, and we wouldn't talk
25 business in front of them.

1 Q. Did they also hang out at the house you had?

2 A. Yes, ma'am.

3 Q. Did you rent that house or purchase that house?

4 A. I rented that house.

5 Q. Can you explain to the jury how the P. Stones made money?

6 A. By selling drugs and women.

7 Q. Where would this drug selling and the sale of women where
8 would that occur?

9 A. Everywhere in Monroe County.

10 Q. Can you name some of the places?

11 A. We used to be at the Howard Johnson. We used to be at the
12 Quality Inn on Main Street.

13 Q. When you say the Howard Johnson, are you talking about the
14 Howard Johnson in Bartonsville?

15 A. Yes, ma'am, right off the exit across the street from the
16 Chili's down the street from the Crossings.

17 Q. Okay. What about the Quality Inn, what --

18 A. That's right there on Main Street -- right there by --
19 there's a gas station. That's not Ponderosa. I can't remember
20 the name of the restaurant, but it's right across the street.

21 Q. Would that be the -- in Stroudsburg?

22 A. Yes, ma'am.

23 Q. And where else?

24 A. We also used to be at the hotel over by the hospital.

25 It's the Super 8 if I'm not mistaken.

1 Q. And did you yourself ever actually stay at any of these
2 hotels?

3 A. Yes, ma'am.

4 Q. When was that? Was that before you got the house, after
5 or both?

6 A. Both.

7 Q. Let's start with the Howard Johnson.

8 A. Yes, ma'am.

9 Q. Was there a particular section of the Howard Johnson that
10 you and the other P. Stones stayed in?

11 A. When we would always check in, they would give us a room
12 in the back hallway.

13 Q. I'm going to show you in -- on your screen Government's
14 Exhibit 1.1. If you take a look at Government's Exhibit 1.1?

15 A. All right.

16 Q. Do you recognize what this --

17 A. Yeah, this the Howard Johnson. This is 601 right here.

18 Q. Would that be 611?

19 A. Yeah, 611. I'm sorry. I'm thinking about South Carolina.

20 Q. That's okay.

21 A. Right here is the front of the building.

22 Q. Is that the only entrance?

23 A. No, there's an entrance here, and there's an entrance
24 here. And if I am not mistaken, I think there's one there,
25 too.

1 Q. With doors into the hotel?

2 A. Yes, ma'am.

3 Q. What about by a car, how do you get in if you're driving a
4 car?

5 A. If you're driving a car --

6 Q. From 611?

7 A. From 611, you come in this way, I think, and this is right
8 here where the -- where the, like, the lobby is.

9 Q. What section was it that you were actually staying in?

10 A. Back here.

11 Q. Always?

12 A. Yes.

13 Q. In order to get to that back section, do you have to pass
14 the lobby?

15 A. Yeah, you drive this way. There's no in. You have to
16 come this way.

17 Q. Every car that enters the lodge has to pass in that --

18 A. Yeah.

19 Q. By the lobby?

20 A. Yeah.

21 Q. How often approximately would you stay at the Howard
22 Johnson?

23 A. Frequently, like, we would get there, and we would pay,
24 like, daily but when we get there, and we pay daily, there
25 would be days where we say, okay, when we make the money

1 tonight, we'll just redo the room in the morning.

2 Q. When you say we, who else -- can you give some names of
3 other individuals --

4 A. Black, Scarlet, my son's father, his name is Benjamin
5 Lingard. And he's the one I went with after I got the house.

6 Q. Okay. Was your son's father, is he a P. Stones member?

7 A. No.

8 Q. Was he staying at the Howard Johnson as well?

9 A. Yes, ma'am.

10 Q. Let's start with before you purchased the house.

11 A. Yes, ma'am.

12 Q. Why would you stay at the Howard Johnson before you
13 purchased a house if at the time you had a home with your
14 grandmother?

15 A. Honestly, when -- the reason why I left my grandma's house
16 was because I got pregnant. But my grandfather had told me if
17 I ever got pregnant I didn't have to worry about living there,
18 that he raised his kids. So when I got pregnant, I was
19 basically homeless, and a lot of the other P. Stones members
20 were homeless. So we'd bounce from hotel to hotel.

21 Q. So when you started staying at the Howard Johnson, was it
22 a day or two here and there or for long periods of time?

23 A. A week sometimes or a day or two. It was never really a
24 specific time how long we stayed there. It was more or less we
25 went with the flow.

1 Q. When you say we, are you talking about your --

2 A. We as the gang.

3 Q. And once you -- at some point did you lose the house on
4 Main Street?

5 A. Yes, I did.

6 Q. When was that?

7 A. Not even a month after getting the house.

8 Q. So you had it for approximately how many months?

9 A. Approximately, like, maybe two months, if that. A month
10 and a half at most.

11 Q. After you lost the house where would you go?

12 A. I was back bouncing from hotel to hotel.

13 Q. And would you go to the Howard Johnson?

14 A. Yes, ma'am.

15 Q. Did you know anyone employed at the Howard Johnson?

16 A. I didn't know him personally, but I do know of the -- one
17 of the owners.

18 Q. And do you know what one of the owners -- who you're
19 talking about, do you know what his name is?

20 A. Faizal.

21 Q. Do you see him in the courtroom today? You can stand up
22 if you need to.

23 A. Faizal is the one closer to the left down this way closer
24 to the jury.

25 MS. ROBERTS: Can you describe what he's wearing

1 briefly? If you can see.

2 THE WITNESS: I don't have any glasses on.

3 MS. ROBERTS: Okay.

4 THE WITNESS: He got kind of cowlicks right here and
5 a black mask, and I can't see if that's a blue suit. We can't
6 see.

7 THE COURT: We will let the record reflect she
8 identified the defendant.

9 THE WITNESS: Thank you.

10 BY MS. ROBERTS:

11 Q. How did you know Faizal?

12 A. When we would come to the Howard Johnson, there would be
13 times -- and this has both happened when I was with the P.
14 Stones and when I was with my son's father where he would tell
15 us, you don't want to get a room here tonight, the feds are
16 here.

17 Q. And so would you go someplace else?

18 A. He would tell us we can try the Quality Inn.

19 Q. Would you go to the Quality?

20 A. There would be times we did go to the Quality and other
21 times we didn't. We just went somewhere else.

22 Q. Where would Faizal be when you would talk to him?

23 A. Behind the counter.

24 Q. When you say behind the counter, in what building?

25 A. The Howard Johnson.

1 Q. Would that be the reception area of the hotel?

2 A. The main lobby.

3 Q. When you did stay there --

4 A. Yes, ma'am.

5 Q. How would you pay for the rooms? Would they be in your
6 name?

7 A. Sometimes they would be in my name. Sometime they would
8 be in other people name. When we and my son's father started
9 saying there, it was in his name mostly.

10 Q. How come they wouldn't be in your name?

11 A. I didn't think I was old enough.

12 Q. And how were you actually paying for the rooms at the
13 Howard Johnson?

14 A. We would go and put money on a prepaid debit card. We use
15 the American Express cards. They are blue, and you can get
16 them from C. V. S.

17 Q. When you were staying at the Howard Johnson with the P.
18 Stones, was there any criminal activity?

19 A. Yes, ma'am.

20 Q. By the P. Stones there?

21 A. Yes, ma'am.

22 Q. Can you describe for the jury what type of criminal
23 activity was going on at the Howard Johnson?

24 A. They would sell girls and sell drugs. We would be in the
25 room, and they would get a call, and let's say somebody wanted

1 to buy a bundle of heroin, which is ten bags of heroin, they
2 would tell them, we're at the Howard Johnson and give them the
3 room number, and they would walk right in and come, or we let
4 them in sometimes if the door was locked.

5 Q. When you say you would let them in, do you mean the --

6 A. The side door.

7 Q. Of the hotel?

8 A. Yes, ma'am.

9 Q. Did you have rooms by side doors of that hotel?

10 A. Yes, ma'am, that back hallway there's two doors. There's
11 one on each end.

12 Q. And did you observe the members actually selling the
13 drugs?

14 A. Yes, ma'am.

15 Q. Did you actually see the drugs?

16 A. Yes, ma'am.

17 Q. You're talking about heroin. Were there any other types
18 of drugs you saw?

19 A. Molly and -- from the Black P. Stones it was molly,
20 heroin, and they also sold weed, my son's father also sold
21 crack cocaine out the hotel and coke.

22 Q. Other than your son's father, what P. Stones members were
23 selling drugs out of the Howard Johnson?

24 A. Black, Arty, Sev, Mills, basically everyone.

25 Q. You talked about bundles. What about the molly, do you

1 remember how they were -- how the molly was being --

2 A. Well, Black got the molly from New York, and he would
3 bring it down in a capsule, or he would get it into grams and
4 sell by the grams, which is like broken down molly. It comes
5 in a rock, but you can also get it in a gram, and it will come
6 in a baggie.

7 Q. How often would the drugs be sold?

8 A. Daily.

9 Q. Were people that you saw at the Howard Johnson -- some of
10 the P. Stones, were they actually also using drugs? Did you
11 observe any drug use?

12 A. Yes, ma'am.

13 Q. How often?

14 A. Often. Like, I'm not perfect. I used to smoke weed. We
15 all used to smoke weed, and we'd smoke in the hotel pretty
16 heavy.

17 Q. When you used to smoke weed, would it have an odor to it?

18 A. Yes, ma'am.

19 Q. Did the hotel rooms themselves you stayed in, did they
20 smell --

21 A. They smelled like smoke, yes, ma'am.

22 Q. Did they smell like cigarette smoke or marijuana smoke?

23 A. Both.

24 Q. What about the hallways? Because it's a hotel and not a
25 motel and the hallways are interior, did the hallways have an

1 odor of marijuana?

2 A. Yeah, pretty much if you would walk in and somebody was
3 smoking weed and you were walking past their door, you could
4 smell it pretty much where you knew to knock on that door if
5 you wanted it.

6 Q. Is that what people would do?

7 A. Random people wouldn't knock on your door. You know what
8 I mean, but, yeah.

9 Q. Were people in that section of the hotel that you
10 described, that back section, were they random people, or were
11 they P. Stones and friends of P. Stones?

12 A. Honestly I feel like it was -- I don't want to say it
13 wasn't just the P. Stones back there. So it wasn't like that
14 section was just for the P. Stones, nothing like that. But I
15 feel like if they knew they had some type of criminal activity
16 or had an idea what they were doing, they would put -- no
17 offense when I say this -- they'd put the value customers in
18 the hallway where you're not going to walk down and smell weed
19 if you get what I'm saying.

20 Q. Okay. Did you notice other than P. Stones members were
21 other people that you observed in that hallway selling drugs?

22 A. Definitely.

23 Q. What about the P. Stones members selling women? Who were
24 they?

25 THE COURT: Let me ask you, it's 5:00, and that's

1 kind of a new area, and I am thinking that that's going to take
2 some time. So I think what we will do is we will break for the
3 day at this point. We have got until 5:00. You had a full
4 day, and this seems to be a logical time for us to break. And
5 so we will do that and continue tomorrow morning at 9:30. In
6 the meantime --

7 THE WITNESS: Am I supposed to be back here at 9:30?

8 THE COURT: Yes. In the meantime -- a couple things.
9 Some of you are taking notes. Please remember the notes have
10 to be left in an envelope in the jury room. They can't be
11 taken out of the courthouse. Secondly, no conversation or
12 discussion among yourselves or with anyone else about the case.
13 Don't form any opinions. You have not heard all of the
14 evidence or the law that relates to the case. No research of
15 any kind concerning any names, locations, terminology, anything
16 related to the case, no research of any kind. Don't read or
17 listen to anything about the case. If anyone were to talk to
18 you about the case, you must advise us of that immediately.
19 All right. That being said, have a safe trip home. We'll see
20 you back here tomorrow ready to go for 9:30. All right. We
21 will pick up then.

22

23

24

25

REPORTER'S CERTIFICATE

I, Laura Boyanowski, RMR, CRR, Official Court Reporter for the United States District Court for the Middle District of Pennsylvania, appointed pursuant to the provisions of Title 28, United States Code, Section 753, do hereby certify that the foregoing is a true and correct transcript of the within-mentioned proceedings had in the above-mentioned and numbered cause on the date or dates hereinbefore set forth; and I do further certify that the foregoing transcript has been prepared by me or under my supervision.

s/ Laura Boyanowski, RMR, CRR
Laura Boyanowski, RMR, CRR
Official Court Reporter

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